



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

NORTH PLANT  
Inspection Date 10-3-2000  
Time Start 10:00 AM  
Time Finish 12:00 PM

## HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR☐ S Q GENERATOR

Company name TRINITY INDUSTRIES I.D. Number PAD004334181  
Site Address 80 UNION ST. GREENVILLE, PA 16125  
County MERCER Municipality GREENVILLE Zip 16125  
Name of Inspector JOE GALUS WITH BRIAN MUMMERT  
Name & Title of Responsible Official \_\_\_\_\_  
Person Interviewed LARRY GRAFF - J.M. FLUCK Telephone (724) 588-7000  
Mailing Address (if different from above) SAME AS ABOVE  
Amount of Hazardous Waste Generated per Month: 72200 Pounds \_\_\_\_\_ Kgs

## 1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other \_\_\_\_\_  
PBR: ☐ Neutralization/WWTP ☐ Reclaim Other \_\_\_\_\_  
GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity HandlerUniversal Waste Types NONE

## 3. Hazardous Waste Transporters:

Transporter Name TRI-STATE MOTORS License Number PA-AH0346  
Transporter Name \_\_\_\_\_ License Number \_\_\_\_\_  
Transporter Name \_\_\_\_\_ License Number \_\_\_\_\_

## 4. Types of hazardous waste generated and destination facility (location &amp; type).

| Waste Code  | Waste Description    | Destination Facility |
|-------------|----------------------|----------------------|
| D003 - D001 | PAINT-RELATED WASTES | RINECO               |
| F005        |                      | 1007 VULCAN RD.      |
|             |                      | BENTON, ARK          |
|             |                      | 72105                |
|             |                      |                      |
|             |                      |                      |
|             |                      |                      |
|             |                      |                      |

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 10-3-2000 Identification Number PAD 004334181

Company/Facility/Site Name TRINITY INDUSTRIES - NORTH PLANT

Trinity does not presently operate the North Plant however hazardous wastes which are paint-related from the paint lines are still stored in the shed at the west side of the plant. 6 drums, all properly marked and labeled are stored there now. These drums are the result of cleanups throughout the site. There were no storage violations seen. Cleanup of the site appears to be going well.

Since the hazardous waste storage area is still used Trinity will continue to conduct inspections of the storage areas.

Totes of paint which are still used are stored in a separate shed at the North Plant. Some of this will be moved and used at the South Plant, some may be transported to other Trinity plants.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) \_\_\_\_\_ Date \_\_\_\_\_

Inspector (signature) Joseph A. Galus 10-4-2000



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 2-29-2000Time Start 12:30Time Finish 3:30

## HAZARDOUS WASTE INSPECTION REPORT

NORTH PLANT

☒ GENERATOR☐ S Q GENERATORCompany name TRINITY INDUSTRIES INC. I.D. Number PAD004334181Site Address 100 YORK ST. GREENVILLE, PA. 16125County MERCER Municipality GREENVILLE Zip 16125Name of Inspector JOE GALUS 2-29-2000Name & Title of Responsible Official DONALD CRANE GEN. MGR.Person Interviewed LARRY C. GRAFF Telephone (724) 588-7000Mailing Address (if different from above) SAME AS ABOVEAmount of Hazardous Waste Generated per Month: > 2200 Pounds \_\_\_\_\_ Kgs \_\_\_\_\_

## 1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other \_\_\_\_\_PBR: ☐ Neutralization/WWTP ☐ Reclaim Other \_\_\_\_\_GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity HandlerUniversal Waste Types NONE

## 3. Hazardous Waste Transporters:

Transporter Name TRI-STATE MOTORS License Number PA-AH0346Transporter Name MAUMEE EXPRESS License Number PA-AH 0420Transporter Name TRINITY TND TRANSPORT License Number PA-AH 5198

## 4. Types of hazardous waste generated and destination facility (location &amp; type).

| Waste Code | Waste Description | Destination Facility |
|------------|-------------------|----------------------|
| D001- P005 | PAINT SOLVENT     | RINECO               |
|            |                   | 1007 VULCAN RD       |
|            |                   | BENTON, ARK.         |
|            |                   | 72105                |
|            |                   |                      |
|            |                   |                      |
|            |                   |                      |
|            |                   |                      |

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

## HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name TRINITY- NORTH ID Number PAD004334181 Date 2-29-2000

1 - No Violation Observed    2 - Not Applicable    3 - Not Determined    4 - Non Compliance

### STATUS

| 1 | 2 | 3 | 4 | REQUIREMENT   | PA CIT.<br>25 PA Code | FED. CIT.<br>40 CFR       | LINE<br>NO. |
|---|---|---|---|---|-----------------------|---------------------------|-------------|
| ✓ |   |   |   | Hazardous waste determination performed on all waste streams                                    | 262a.10               | 262.11                    | H001        |
| ✓ |   |   |   | Identification Number   | 262a.10               | 262.12                    | H002        |
| ✓ |   |   |   | Authorized transporters only  | 262a.10               | 262.12(c)                 | H003        |
| ✓ |   |   |   | Subsequent notification requirements met  | 262a.12(b)            |                           | H004        |
| ✓ |   |   |   | Proper manifest used  | 262a.10               | 262.21                    | H005        |
| ✓ |   |   |   | Manifests filled out correctly and completely   | 262a.20               |                           | H006        |
| ✓ |   |   |   | Manifests signed and routed properly  | 262a.23(a)            | 262.23                    | H007        |
| ✓ |   |   |   | Generator waste accumulated on site for 90 days or less   | 262a.10               | 262.34(a)                 | H008        |
|   | ✓ |   |   | SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days | 262a.10               | 262.34(e)(f)              | H009        |
|   | ✓ |   |   | SQG waste accumulated on-site never exceeds 6000 kg   | 262a.10               | 262.34(e)(f)              | H010        |
|   | ✓ |   |   | Satellite accumulation requirements complied with   | 262a.10               | 262.34(c)                 | H011        |
| ✓ |   |   |   | Personnel training program per 265.16 complied with   | 262a.10               | 262.34(a)(4)<br>262.34(d) | H012        |
|   |   | ✓ |   | Manifest exception and biennial reports retained for 3 years                                    | 262a.10               | 262.40(a)(b)              | H013        |
|   | ✓ |   |   | Specified records retained for three years  | 262a.10               | 262.40(c)                 | H014        |
|   |   | ✗ |   | Biennial reports submitted to the Department (LQG only)   | 262a.41               | 262.41                    | H015        |
|   | ✓ |   |   | Exception reporting procedures followed   | 262a.42               | 262.42                    | H016        |
| ✓ |   |   |   | Spill reporting procedures followed   | 262a.10               | 262.34(d)                 | H017        |
| ✓ |   |   |   | PPC plan developed and implemented  | 262a.10               | 262.34(a)                 | H018        |
|   | ✓ |   |   | Special requirements followed for international shipments                                       | 262a.10               | 262.50<br>262.60          | H019        |
|   |   | ✓ |   | Source reduction strategy prepared and available (LQG only)                                     | 262a.100              |                           | H020        |
|   | ✓ |   |   | Excluded waste complies with exclusionary requirements  | 261a.4                | 261.4                     | H021        |
|   |   |   |   |   |                       |                           |             |
|   |   |   |   |   |                       |                           |             |
|   |   |   |   |   |                       |                           |             |
|   |   |   |   |   |                       |                           |             |
|   |   |   |   |   |                       |                           |             |

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT  
GENERATORS -- SMALL QUANTITY GENERATORS  
FACILITY SPECIFICS**

Site Name TRINITY - NORTH ID Number PAD004334181 Date 2-29-2000

1 - No Violation Observed    2 - Not Applicable    3 - Not Determined    4 - Non Compliance

**STATUS**

| 1 | 2 | 3 | 4 | REQUIREMENT  | PA CIT.<br>25 PA Code      | FED CIT.<br>40 CFR | LINE<br>NO. |
|---|---|---|---|--|----------------------------|--------------------|-------------|
|   |   |   |   | <b>CONTAINERS (Subchapter I)</b>   |                            |                    |             |
| ✓ |   |   |   | Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I               | 262a.10                    | 262.34             | H025        |
| ✓ |   |   |   | Containers of hazardous waste in good condition  | 265a.1                     | 265.171            | H026        |
| ✓ |   |   |   | Containers and stored waste compatible   | 265a.1                     | 265.172            | H027        |
| ✓ |   |   |   | Containers kept closed except during addition or removal of wastes   | 265a.1                     | 265.173(a)         | H028        |
| ✓ |   |   |   | Containers managed to prevent leaks  | 265a.1                     | 265.173(b)         | H029        |
| ✓ |   |   |   | Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment | 265a.173                   |                    | H030        |
| ✓ |   |   |   | Container storage areas inspected at least weekly  | 265a.1                     | 265.174            | H031        |
| ✓ |   |   |   | Special requirements for ignitable or reactive and incompatible waste complied with                                    | 265a.1                     | 265.176-177        | H032        |
| ✓ |   |   |   | Proper containment and collection systems in place   | 265a.179                   |                    | H033        |
| ✓ |   |   |   | Air emission standards complied with (AA, BB, CC)  | 265a.1                     | 265.178            | H034        |
| ✓ |   |   |   | Containers clearly marked with accumulation date and visible for inspection  | 262a.10                    | 262.34(a)(2)       | H035        |
| ✓ |   |   |   | Containers labeled "Hazardous Waste"   | 262a.10                    | 262.34(a)(3)       | H036        |
| ✓ |   |   |   | Containers labeled accurately identify contents  | SWMA<br>6018.403(b)<br>(2) |                    | H037        |

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES  
BUREAU OF WASTE MANAGEMENT

## INSPECTION REPORT COMMENTS

Date of Inspection 2-29-2000 Identification Number PAD004334181Company/Facility/Site Name TRINITY IND- NORTH

Trinity Industries assembles and paints rail-  
road freight cars. The plant is divided into  
two sites, a North plant and a South plant.  
Presently the South Plant does not operate.

Paint-related solvent wastes are generated  
from the paint line, collected in 55-gallon drums  
then stored in a waste storage building west of  
the main plant. Over a half dozen drums are  
stored in the building. All are in good shape, no  
leaks and all are labeled with a Hazardous  
Waste label and all are marked with the  
accumulation date. None are over the 90-day  
limit. All drums had labels on the outside so  
the label could be easily read.

The storage building is also used to store  
virgin oil, off-spec paint in totes and drums  
of waste oil/wastewater. The floor is sloped  
and without drums and there is a berm  
around the bottom of the building. There appears to  
be no leaks in the roof. The storage area is  
inspected weekly and an inspection log is kept  
and is on file. There are no wastes stored in  
the storage building at the south plant. The  
building is also labeled as a hazardous waste

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) \_\_\_\_\_

Date \_\_\_\_\_

Inspector (signature) \_\_\_\_\_

Joseph A. Galus

Date \_\_\_\_\_

2-29-2000

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES  
BUREAU OF WASTE MANAGEMENT

## INSPECTION REPORT COMMENTS

Date of Inspection 2-29-2000 Identification Number PAD 004334181Company/Facility/Site Name TRINITY - NORTH  
storage area.

Training records for personnel handling the hazardous waste are kept. Trinity has a specific training plan and a sign-in sheet was seen. There is only one trained person working presently. Production is at a minimum. With the condition of the storage building it appears the training is quite sufficient.

The PPE Plan appears to cover everything needed. It is being updated now. Trinity seems to have enough equipment and materials to handle a spill. Regionally Trinity uses Curra as a haz-mat cleanup responder.

Recent manifests are on file and all have the signed disposal copy. Also with each manifest is the Land Disposal Notification and the Rincor Certificate of disposal.

A recent Hazardous Waste Biennial Report (for 1999 due by March 1, 2000) has not been submitted. Trinity did not receive the EPA form. A copy will be sent with this inspection report.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) \_\_\_\_\_ Date \_\_\_\_\_  
Inspector (signature) Joseph A. Galan Date 3-1-2000

Hazardous Waste Inspection Report  
Generators - Part AFOLLOW-UP  
INSPECTION

Date of inspection 11-6-91 Time start 1:30 Time finish 2:15  
 Name of inspector JOE GALUS  
 Company, installation name TRINITY INDUSTRIES, GREENVILLE CAR DIVISION  
 Location UNION ST, STEWART AVE, AND MERCER ST. GREENVILLE  
 County MERCER Municipality GREENVILLE  
 Identification number PAD 004334181 (NORTH PLANT) PAD 004342556 (SOUTH PLANT)  
 Name of responsible official JACK McCAFFERY  
 Title PLANT SAFETY DIRECTOR  
 Mailing address 60 UNION ST. GREENVILLE PA 16125  
 Area code and telephone number 412/588-7000  
 Name of person interviewed JACK McCAFFERY  
 Title SAME AS ABOVE  
 Mailing address (if different from above) " " "  
 Area code and telephone number " " "

## 1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR  
 b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim  
 c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal  
 d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

## 2. Amount of hazardous waste produced:

- a. 14,650 LBS/MO. kg./mo.  
 b. \_\_\_\_\_ kg./yr.

## 3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

| Waste Number | Destination Facility    | Location and Type           |
|--------------|-------------------------|-----------------------------|
| D001-D002    | EVERGREEN ENVIRONMENTAL | 33 INDUSTRY DR. BEDFORD, C. |
| F001-F002-   |                         | 44/66                       |
| F003-F005    |                         |                             |
|              |                         |                             |
|              |                         |                             |
|              |                         |                             |
|              |                         |                             |
|              |                         |                             |



Hazardous Waste Inspection Report  
Generators — Part B

| 1—No Violation Observed |   |   |   | 2—Not Applicable   | 3—Not Determined | 4—Non-Compliance |
|-------------------------|---|---|---|--|------------------|------------------|
| Status                  |   |   |   | REQUIREMENT  |                  | Chapter Citation |
| 1                       | 2 | 3 | 4 |  |                  | 75.262           |
| ✓                       |   |   |   | Hazardous waste determination, copies available                                |                  | (b)              |
| ✓                       |   |   |   | Identification number  |                  | (c)(1)           |
| ✓                       |   |   |   | Hazardous waste shipments offered only to licensed transporters                |                  | (c)(4)           |
| ✓                       |   |   |   | Authorization received from TSD facility for wastes shipped off-site           |                  | (d)              |
| ✓                       |   |   |   | PA manifest used for intrastate shipments                                      |                  | (e)(2)           |
|                         | ✓ |   |   | Disposer state manifest or EPA format manifest used for out-of-state shipments |                  | (e)(3)           |
| ✓                       |   |   |   | Manifests filled out properly and completely                                   |                  | (e)(7)           |
| ✓                       |   |   |   | Manifests routed properly and within time limits (7 days)                      |                  | (e)(14) or (15)  |
| ✓                       |   |   |   | Proper U.S. DOT shipping containers or packages                                |                  | (f)(1)(i)        |
| ✓                       |   |   |   | Shipping containers marked and labeled according to U.S. DOT                   |                  | (f)(1)(ii)       |
| ✓                       |   |   |   | Containers of 110 gal. or less marked with required PA label                   |                  | (f)(1)(iii)      |
|                         | ✓ |   |   | Placards offered to transporter  |                  | (f)(2)           |
| ✓                       |   |   |   | Wastes accumulated on-site for less than 90 days                               |                  | (g)(1)(i)        |
| ✓                       |   |   |   | Wastes stored in proper containers and properly marked and labeled             |                  | (g)(1)(ii)       |
|                         |   |   | X | Containers managed in accordance with 75.265(q)(1)–(9)                         |                  | (g)(1)(iii)      |
| ✓                       |   |   |   | Containers clearly marked with accumulation date and visible for inspection    |                  | (g)(1)(iv)       |
| ✓                       |   |   |   | Records retained at designated location for 20 years                           |                  | (h)              |
| ✓                       |   |   |   | Quarterly reports submitted to the Department                                  |                  | (i)              |
| ✓                       |   |   |   | Exception reporting procedures followed  |                  | (j)              |
|                         | ✓ |   |   | Hazardous waste disposal plan, if required                                     |                  | (l)              |
|                         | ✓ |   |   | Spill reporting procedures followed  |                  | (m)(1)           |
| ✓                       |   |   |   | Preparedness, Prevention and Contingency Plan and implemented                  |                  | (m)(5)           |
|                         | ✓ |   |   | Special requirements followed for international shipments                      |                  | (o)              |
| ✓                       |   |   |   | On the job or classroom personnel training program [75.265(f)]                 |                  | (g)(1)(6)        |
| ✓                       |   |   |   | Drum accumulation area inspected weekly as per 75.265(q)(5)                    |                  | (g)(1)(iii)      |
| ✓                       |   |   |   | <i>Improper storage of a residual or solid waste</i><br>75.28(b)(c)(d)         |                  |                  |
|                         |   |   |   |  |                  |                  |
|                         |   |   |   |  |                  |                  |

Hazardous Waste Inspection Report  
Comments - Part C

Date of Inspection 11-6-91 Identification Number PAD 004334181 (NORTH)  
PAD 004342556 (SOUTH)  
Company, Installation Name TRINITY INDUSTRIES — GREENVILLE CR DIVISION  
County MERCER Municipality GREENVILLE

Plans for drum storage containment areas have been approved and are on file. At this time the Greenville division of Trinity Industries await approval for the funding of the containment structures. These containment areas should be completed by the end of this year (1991). Fill material is now in place at the North plant. The dike concrete containment area will be constructed on this fill. A sump will be located at the back end. Trinity will also store product solvents and other materials here besides the hazardous waste. The area where the fill is located is the former storage area for drums of waste paint and paint-related materials and for storage of shotblast waste. All drums of paint waste have been removed and transported off-site. The ground has been cleaned up and the surface graded over. The shotblast waste now is transported to BFI landfill in Poland Ohio. This waste is no longer stored on the ground but is now containerized.

The drum storage containment area at the south plant will be built on the concrete pad now used. The cracks will be filled and metal angle bars will be attached to metal bars in the concrete. These will be filled with cement and used as a dike. A sump will also be installed.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Joseph A. Galus 11-7-91

Hazardous Waste Inspection Report  
Generators - Part A

Gen

8.25 TOTAL HOUR

Date of inspection 7-23-91 Time start 1:30 Time finish 4:15  
 Name of inspector JOE GALUS (WITH CARY PESEK-WATER QUALITY)  
 Company, installation name TRINITY INDUSTRIES, GREENVILLE CAR DIVISIO  
 Location UNION ST., STEWART AVE., AND MERCER ST. - GREENVILLE  
 County MERCER Municipality GREENVILLE- HEMPFIELD  
 Identification number PAD 004334181 <sup>NORTH PLANT</sup> AND PAD 004342556 <sup>SOUTH PLANT.</sup> TWP.  
 Name of responsible official JACK M<sup>S</sup>CAFFERY  
 Title PLANT SAFETY DIRECTOR  
 Mailing address 60 UNION ST. GREENVILLE, PA 16125  
 Area code and telephone number 412/588-7000  
 Name of person interviewed JACK M<sup>S</sup>CAFFERY  
 Title VE  
 Mailing address (if different from above) \_\_\_\_\_  
 Area code and telephone number \_\_\_\_\_

## 1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal, ☐ PBR  
 b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim  
 c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal  
 d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

## 2. Amount of hazardous waste produced:

- a. APPROXIMATELY 14,650 lbs/mo. kg./mo.  
 b. \_\_\_\_\_ kg./yr.

## 3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

| Waste Number   | Destination Facility     | Location and Type             |
|----------------|--------------------------|-------------------------------|
| D001-D002      | EVER GREEN ENVIRONMENTAL | 33 INDUSTRY DR. BEDFORD, OHIO |
| F001-F002-F003 |                          | 44166                         |
| and F005       |                          |                               |
|                |                          |                               |
|                |                          |                               |
|                |                          |                               |
|                |                          |                               |

Pennsylvania Department of Environmental Resources  
Bureau of Waste Management

Hazardous Waste Inspection Report  
Land Disposal Restriction Supplemental Checklist

| 1-No Violation Observed |   |   |   | 2-Not Applicable  | 3-Not Determined | 4-Non-Compliance        |
|-------------------------|---|---|---|---|------------------|-------------------------|
| Status                  |   |   |   | REQUIREMENT   |                  | Citation                |
| 1                       | 2 | 3 | 4 |   |                  | 40 CFR Part 268         |
|                         |   |   |   | <b>Generators</b>   |                  |                         |
| ✓                       |   |   |   | Notification sent with shipments of wastes that do not meet treatment standards.  |                  | 7(a)(1)                 |
| ✓                       |   |   |   | Notification and certification sent with shipments of wastes meeting treatment standards.   |                  | 7(a)(2)                 |
| ✓                       |   |   |   | Dilution not used as a substitute for treatment.  |                  | 3                       |
|                         |   | ✓ |   | Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.    |                  | 7(a)(5), (a)(6)         |
|                         |   |   |   | <b>Storage Facilities</b>   |                  |                         |
|                         |   |   |   | Facility verifies generators classification of waste in accordance with waste analysis plan.  |                  | 25 Pa Code 265.13(c)    |
|                         |   |   |   | Containers marked to identify contents and accumulation date.   |                  | 50(a)(2)                |
|                         |   |   |   | Notification sent with shipments of wastes that do not meet treatment standards.  |                  | 7(a)(1)                 |
|                         |   |   |   | Notification and certification sent with shipments of wastes meeting treatment standards.   |                  | 7(a)(2)                 |
|                         |   |   |   | Facility maintains records of documents produced pursuant to LDR requirements.  |                  | 7(a)(6)                 |
|                         |   |   |   | <b>Treatment Facilities, including PBR and RRR Facilities</b>   |                  |                         |
|                         |   |   |   | Dilution not used as a substitute for treatment.  |                  | 3                       |
|                         |   |   |   | Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan. |                  | 7(b)                    |
|                         |   |   |   | Certification and/or notification sent with shipments of waste.   |                  | 7(b)(4), (b)(5), (b)(6) |
|                         |   |   |   | <b>Land Disposal Facilities</b>   |                  |                         |
|                         |   |   |   | Facility tests wastes received to assure compliance with applicable treatment standards.  |                  | 7(c)(2)                 |
|                         |   |   |   | Facility land disposes of restricted waste only if it meets applicable treatment standard.  |                  | 40                      |
|                         |   |   |   | Facility retains copies of generator notifications and certifications.  |                  | 7(c)(1)                 |

Hazardous Waste Inspection Report  
Generators — Part B

| 1—No Violation Observed |   |   |   | 2—Not Applicable   | 3—Not Determined | 4—Non-Compliance                    |
|-------------------------|---|---|---|--|------------------|-------------------------------------|
| Status                  |   |   |   | REQUIREMENT  |                  | Chapter Citation                    |
| 1                       | 2 | 3 | 4 |  |                  | 75.262                              |
| ✓                       |   |   |   | Hazardous waste determination, copies available                                |                  | (b)                                 |
| ✓                       |   |   |   | Identification number  |                  | (c)(1)                              |
| ✓                       |   |   |   | Hazardous waste shipments offered only to licensed transporters                |                  | (c)(4)                              |
| ✓                       |   |   |   | Authorization received from TSD facility for wastes shipped off-site           |                  | (d)                                 |
| ✓                       |   |   |   | PA manifest used for intrastate shipments                                      |                  | (e)(2)                              |
|                         | ✓ |   |   | Disposer state manifest or EPA format manifest used for out-of-state shipments |                  | (e)(3)                              |
|                         |   |   | X | Manifests filled out properly and completely                                   |                  | 262.20 (g)(15) 262.23 (h) (e)(7)    |
| ✓                       |   |   |   | Manifests routed properly and within time limits (7 days)                      |                  | (e)(14) or (15)                     |
| ✓                       |   |   |   | Proper U.S. DOT shipping containers or packages                                |                  | (f)(1)(i)                           |
| ✓                       |   |   |   | Shipping containers marked and labeled according to U.S. DOT                   |                  | (f)(1)(ii)                          |
| ✓                       |   |   |   | Containers of 110 gal. or less marked with required PA label                   |                  | (f)(1)(iii)                         |
|                         | ✓ |   |   | Placards offered to transporter  |                  | (f)(2)                              |
| ✓                       |   |   |   | Wastes accumulated on-site for less than 90 days                               |                  | (g)(1)(i)                           |
| ✓                       |   |   |   | Wastes stored in proper containers and properly marked and labeled             |                  | (g)(1)(ii)                          |
|                         |   |   | X | Containers managed in accordance with 75.265(q)(1)–(9)                         |                  | 265.178 (a)(b)(c)(d)(e) (g)(1)(iii) |
| ✓                       |   |   |   | Containers clearly marked with accumulation date and visible for inspection    |                  | (g)(1)(iv)                          |
| ✓                       |   |   |   | Records retained at designated location for 20 years                           |                  | (h)                                 |
| ✓                       |   |   |   | Quarterly reports submitted to the Department                                  |                  | (i)                                 |
|                         |   |   | X | Exception reporting procedures followed  |                  | 262.42 (a)(b) (j)                   |
|                         | ✓ |   |   | Hazardous waste disposal plan, if required                                     |                  | (l)                                 |
|                         | ✓ |   |   | Spill reporting procedures followed  |                  | (m)(1)                              |
| ✓                       |   |   |   | Preparedness, Prevention and Contingency Plan and implemented                  |                  | (m)(5)                              |
|                         | ✓ |   |   | Special requirements followed for international shipments                      |                  | (o)                                 |
| ✓                       |   |   |   | On the job or classroom personnel training program (75.265(f))                 |                  | (g)(1)(6)                           |
| ✓                       |   |   |   | Drum accumulation area inspected weekly as per 75.265(q)(5)                    |                  | (g)(1)(iii)                         |
|                         |   |   | X | Improper storage of a residual or solid waste.                                 |                  | 75.28 (b)(c)(d)                     |

Hazardous Waste Inspection Report  
Comments - Part C

Date of Inspection 7-23-91 Identification Number PAD 004334181  
PAD 004342556  
 Company, Installation Name TRINITY INDUSTRIES - GREENVILLE CAR DIVISION  
 County MERCER Municipality GREENVILLE

The Greenville Car Division of Trinity Industries is involved in the assembly of railroad cars. The plant is running at less than half its capacity at this time. Hazardous waste generated are mostly from the paint line at both plants. Trinity Industries operates as one plant but there are two divisions. The North plant (PAD 004334181) is the old Greenville steel car plant. The South plant (PAD 004342556) is property formerly owned by the Chicago Bridge and Iron Company which had a PAD EPA Identification number as a hazardous waste generator. This number was transferred to Trinity when it bought the property. Paint line wastes include a waste standard solvent, waste rags used to wipe down the cars (these rags can contain Xylene or paint) waste Xylene and rags, waste paint filters and Filmit which is used in the paint booths on the walls. This is allowed to accumulate then is scrubbed off intermittently. A 49cc solvent formerly used to remove the protective coating on machined wheel parts (truck assembly) is no longer used. Trinity now does all their own <sup>MACHINING</sup> machining on a new computerized line which has been installed since the last inspection. Hazardous wastes at the North plant are stored west of the main portion of the plant. 7 drums of various combinations of waste solvent, rags, paint

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of the inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Joseph A. Zaluski 7-24-91

Hazardous Waste Inspection Report  
Comments - Part C

Date of Inspection 7-23-91 Identification Number PAD 004334181  
PAD 004342556  
Company, Installation Name TRINITY INDUSTRIES - GREENVILLE CAR DIVISION  
County MERCER Municipality GREENVILLE

and filters are stored on a concrete area which is open to the air and is roped off. There is no diking or collection system for this area. Trinity should be aware that this is in violation of Title 25 Chapter 265.178. This says that a containment area should have an impervious base, free of cracks with a sump or collection system and have capacity to hold the entire volume of the largest container or 10% of the total volume of all containers, whichever is greater. This same problem was observed at the South (CBT) plant where generally the same waste streams are generated.

Trinity also generates a non-hazardous shot blast waste at both plants. Trinity has run out of storage containers for this waste at the North plant and now stores this waste on the ground. This material should be stored in containers so there is no contact with the ground. This should be done as soon as possible. Trinity says that a contract with an Ohio landfill has been completed and wastes should be removed this week.

(at the North plant)  
Also located near the residual waste storage area is an open area where various types of paint are stored. Some of these drums are without lids and contents could be seen leaking into the ground. It could not be determined if some of these

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Joseph G. Zalus 7-23-91

Hazardous Waste Inspection Report  
Comments - Part C

Date of Inspection 7-23-91 Identification Number PAD 00434101  
PAD 004342556  
Company, Installation Name TRINITY INDUSTRIES- GREENVILLE CAR DIVISION  
County MERCER Municipality GREENVILLE

materials are reusable. Analysis should be performed and the materials cleaned up immediately and disposed of if they are considered waste. There is no impermeable base in this area so there should be some soil cleanup.

Materials should be stored on a crack-free impervious base with containment so problems like this won't occur in the future. Storage areas also should have a roof or some type of cover to prevent the amount of rain-water runoff.

No copy 5 for manifest numbers PAC 3413631 for 5-15-91 and PAC 3413616 for 4-17-91 could be found with the designated disposal facility date and signature. There was no record of exemption reporting. Copies of these manifests should be submitted to the New Castle office as soon as possible.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

8

Joseph J. Dalus 7-24-91



FY 1989 HAZARDOUS WASTE COMPLIANCE MONITORING AND ENFORCEMENT LOG

6-0-0

EPA

1. EPA ID: P A D 0 0 4 3 3 4 1 0 1  
P A D 0 0 4 3 3 4 1 0 1

2. HANDLER NAME: TRINITY INDUSTRIES

3. ADDRESS: 60 UNION ST. GREENVILLE, PA

5. DATE OF INITIAL EVALUATION WHICH IS THE BASIS FOR THIS REPORT: 7/23/91

5a. AGENCY RESPONSIBLE FOR EVALUATION: S  
 Put code in box

E = EPA  
 S = State  
 C = Contractor/EPA  
 O = Other  
 B = Contractor/State  
 X = Oversight

4. Data Entry

New ☒  
 Update ☐

6. TYPE OF EVALUATION COVERED BY THIS REPORT:

Select Evaluation Type and Insert in box: 1

1 = Compliance Eval. Inspection (CEI) 4 = Comp GWM Eval (CME)  
 2 = Sampling Inspection 5 = Compliance Sched. Eval  
 3 = Record Review 11 = Case Dev. Inspection  
 12 = O&M Inspection  
 13 = CA Oversight Insp.

7. DATE OF EVALUATION COVERED BY THIS REPORT (enter only if different from 5): 7/23/91

7a. Eval. Comments: Hazardous Waste Generator Inspection

8. CLASS and VIOLATIONS

| Key.                             | Class of  |     | Violations |          |       |            |          |          |       |
|----------------------------------|-----------|-----|------------|----------|-------|------------|----------|----------|-------|
|                                  | Violation | GWM | C/PC       | Fin. Res | Pt. B | Compl. Sch | Manifest | Land-Ban | Other |
| 'X' = Violations, no Specialties |           |     |            |          |       |            |          |          |       |
| 'B' = Violations & Specialty     | I         |     |            |          |       |            | 0        | 0        | 0     |
| 'S' = Same Viol./Specialty       |           |     |            |          |       |            |          |          |       |
| 'Z' = Pending determination      | II        |     |            |          |       |            | X        | 0        | X     |
| 'O' = No Viol or Specialty found |           |     |            |          |       |            |          |          |       |
| Acceptable Codes                 |           |     |            |          |       |            |          |          |       |
|                                  |           | X   | X          | X        | X     | X          | X        | X        | X     |
| Specialties                      |           | S   | S          | S        | S     | S          | S        | S        | S     |
| 'I' = No-insurance only          |           | Z   | Z          | Z        | Z     | Z          | Z        | Z        | Z     |
| 'C' = CA Schedule Violation      |           | O   | O          | O        | O     | O          | O        | O        | O     |
| 'H' = HPV                        |           | H   | H          | I*       | H     | C          | H        | H        | H     |
|                                  |           |     |            | B*       |       | B          |          |          |       |
| * = Class I only                 |           |     |            | H        |       | H          |          |          |       |

8a Viol. Comment: Manifest Violations and Drum Containment Area Violations

9. ENFORCEMENT ACTIONS:

| Class | Area of Viol./rel. | Type (use code) | Date Action Taken | Compliance Dates Scheduled | Actual | Penalty Assessed | Collected | Resp. Ag. (use code) |
|-------|--------------------|-----------------|-------------------|----------------------------|--------|------------------|-----------|----------------------|
| II    | MANIFEST           | 03              | 7-23-91           |                            |        |                  |           |                      |
| II    | OT                 | 03              | 7-23-91           |                            |        |                  |           |                      |

Codes for 03 = Warning Letter 11 = Filed Civil Action 15 = CA Init. Admin Order Resp Agcy Codes  
 Types of 04 = Admin. Complaint 12 = Filed Criminal Action 16 = CA Final Admin Order E = EPA  
 Enforcement 05 = Final Admin. Order 18 = Civil Referral to AG/DOJ 21 = Notice of Non-comp. S = State  
 Actions: 10 = Informal 19 = Final Judicial Order 22 = FFCA X = EPA Oversight  
 23 = Fed. Fac. Referral to HQ

10. Enforc. Comment: 30 days for manifest compliance 00 days for drum containment.

IR

4012

Gen

Hazardous Waste Inspection Report  
Generators - Part A

Date of inspection 12-28-89 Time start 10:00 AM Time finish 11:30 AM  
 Name of inspector JOE GALUS  
 Company, installation name TRINITY INDUSTRIES, GREENVILLE CAR DIVISION  
 Location SOUTH OF YORK AVE. SOUTH OF GREENVILLE BORO IN HEMPFIELD  
 County MERCER Municipality HEMPFIELD TWP  
 Identification number PAD 004334181  
 Name of responsible official ALBERT BEERS. PLANT MANAGER  
 Title PLANT MANAGER  
 Mailing address 60 UNION ST. P.O. BOX 751, GREENVILLE, PA. 16125  
 Area code and telephone number 412-588-7000  
 Name of person interviewed JACK McCAFFERY  
 Title PLANT SAFETY DIRECTOR  
 Mailing address (if different from above) SAME AS ABOVE  
 Area code and telephone number " " "

## 1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR  
 b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim  
 c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal  
 d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

## 2. Amount of hazardous waste produced:

- a. \_\_\_\_\_ kg./mo.  
 b. \_\_\_\_\_ kg./yr.

## 3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

| Waste Number | Destination Facility | Location and Type |
|--------------|----------------------|-------------------|
| D001         | ERIENAY INC.         |                   |
| F001         | " "                  |                   |
| F003         | " "                  |                   |
|              |                      |                   |
|              |                      |                   |
|              |                      |                   |
|              |                      |                   |
|              |                      |                   |

Hazardous Waste Inspection Report  
Generators - Part B

| 1—No Violation Observed |   |   |   | 2—Not Applicable   | 3—Not Determined | 4—Non-Compliance |
|-------------------------|---|---|---|--|------------------|------------------|
| Status                  |   |   |   | REQUIREMENT  |                  | Chapter Citation |
| 1                       | 2 | 3 | 4 |  |                  | 75.262           |
| ✓                       |   |   |   | Hazardous waste determination, copies available                                |                  | (b)              |
| ✓                       |   |   |   | Identification number  |                  | (c)(1)           |
|                         |   | ✓ |   | Hazardous waste shipments offered only to licensed transporters                |                  | (c)(4)           |
| ✓                       |   |   |   | Authorization received from TSD facility for wastes shipped off-site           |                  | (d)              |
|                         |   | ✓ |   | PA manifest used for intrastate shipments                                      |                  | (e)(2)           |
|                         |   | ✓ |   | Disposer state manifest or EPA format manifest used for out-of-state shipments |                  | (e)(3)           |
|                         |   | ✓ |   | Manifests filled out properly and completely                                   |                  | (e)(7)           |
|                         |   | ✓ |   | Manifests routed properly and within time limits (7 days)                      |                  | (e)(14) or (15)  |
| ✓                       |   |   |   | Proper U.S. DOT shipping containers or packages                                |                  | (f)(1)(i)        |
| ✓                       |   |   |   | Shipping containers marked and labeled according to U.S. DOT                   |                  | (f)(1)(ii)       |
| ✓                       |   |   |   | Containers of 110 gal. or less marked with required PA label                   |                  | (f)(1)(iii)      |
|                         |   | ✓ |   | Placards offered to transporter  |                  | (f)(2)           |
|                         |   | ✓ |   | Wastes accumulated on-site for less than 90 days                               |                  | (g)(1)(i)        |
| ✓                       |   |   |   | Wastes stored in proper containers and properly marked and labeled             |                  | (g)(1)(ii)       |
| ✓                       |   |   |   | Containers managed in accordance with 75.265(q)(1)-(9)                         |                  | (g)(1)(iii)      |
|                         |   |   | X | Containers clearly marked with accumulation date and visible for inspection    |                  | (g)(1)(iv)       |
|                         | ✓ |   |   | Records retained at designated location for 20 years                           |                  | (h)              |
|                         | ✓ |   |   | Quarterly reports submitted to the Department                                  |                  | (i)              |
|                         | ✓ |   |   | Exception reporting procedures followed  |                  | (j)              |
|                         | ✓ |   |   | Hazardous waste disposal plan, if required                                     |                  | (l)              |
|                         | ✓ |   |   | Spill reporting procedures followed  |                  | (m)(1)           |
|                         | ✓ |   |   | Preparedness, Prevention and Contingency Plan and implemented                  |                  | (m)(5)           |
|                         | ✓ |   |   | Special requirements followed for international shipments                      |                  | (o)              |
|                         | ✓ |   |   | On the job or classroom personnel training program [75.265(f)]                 |                  | (g)(1)(6)        |
|                         | ✓ |   |   | Drum accumulation area inspected weekly as per 75.265(q)(5)                    |                  | (g)(1)(iii)      |
|                         |   |   |   |  |                  |                  |
|                         |   |   |   |  |                  |                  |
|                         |   |   |   |  |                  |                  |
|                         |   |   |   |  |                  |                  |

Hazardous Waste Inspection Report  
Comments - Part C

Date of Inspection 12-28-89 Identification Number PAD 004334181  
Company, Installation Name TRINITY INDUSTRIES  
County MERCER Municipality HEMPFIELD

This inspection was conducted at the new Trinity facility in Greenville located in the old Chicago Bridge and Iron plant. Therefore, some of the items on this inspection report are marked as not applicable. Trinity is operating a painting line at the new facility. At this time no wastes have been transported off-site. No paint filters have been changed yet. There was two drums of waste bags used to wipe off solvent in preparing the railroad car for painting. These drums had the proper labeling but were not marked with the accumulation date.

Trinity has not decided how the wastes at the new facility will be transported. The drums could be transported to the Union St plant which is about a half mile or about 3 blocks away. If this is done then Trinity will need a transporter license to transport hazardous waste. It has also been proposed that the waste will be stored on the former CB&I site and transported off-site from there.

Trinity uses no parts of the former CB&I operation. Some old pickling tanks and acid storage tanks still remain but are not operated. The pickling vats will be filled in and the acid storage tank sold if possible. There is also no production on or near the old acid disposal lagoon.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature)

Joe Jones

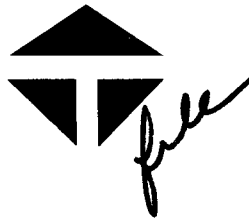
Date

12-13-89

Inspector (signature)

Date

**TRINITY INDUSTRIES, INC.**  
**GREENVILLE DIVISION**



April 11, 1988

Waste Management Branch  
United States EPA - Region III  
841 Chestnut Street  
Philadelphia, PA 19106

RE: Greenville Steel Car Company  
EPA ID PAD004334181  
Change Of Ownership

Dear Sir:

Please be advised that Greenville Steel Car Company has recently been purchased from AMPCO-Pittsburgh Corporation by Trinity Industries, Inc., 2525 Stemmons Freeway, Dallas, Texas 75207.

This facility will now be known as Trinity Industries, Inc., Greenville Car Division, 60 Union Street, Greenville, PA 16125. We still wish to retain our EPA ID of PAD004334181, and would appreciate your acknowledgment of this retention.

Thank you.

Very truly yours,

TRINITY INDUSTRIES, INC.  
GREENVILLE CAR DIVISION

*J P McCaffrey*  
John P. McCaffrey  
Plant Safety Manager

JPM:sm

cc: AAB  
J. Riddles  
File

**RECEIVED**  
**PA SECTION**

**APR 14 1988**

**EPA, R3**

CERTIFIED NUMBER  
166870

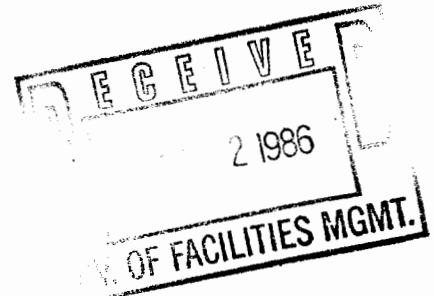
*Name + Ownership Change  
coded 4/25/88 n J*

TO → 6  
BSW/LEPA  
1012 Water Street  
Meadville, Pennsylvania 16335  
Telephone: A. C. 814/724-8526

CERTIFIED MAIL

Subject: Letter-Agreement  
Greenville Steel Car Company  
City of Greenville, Mercer County  
I.D. #PAD004334181

Mr. William Bubeck, Director of Safety & Security  
Greenville Steel Car Company  
Union Street  
Greenville, Pennsylvania 16125



Dear Mr. Bubeck:

I am forwarding three (3) copies of a Letter-Agreement in settlement of violations of the Pennsylvania Solid Waste Management Act, the Act of July 7, 1980, P.L. 380, 35 P.S. Section 6018.101 et seq., which occurred at your company's Greenville facility. Please sign all copies and return them to this Office within ten (10) days of your receipt thereof. You will receive an executed copy for your records after the document is signed on behalf of the Department of Environmental Resources. The facts of the matter and the terms of this settlement are as follows:

- 1) Greenville Steel Car Company did not notify the Department by telephone within 24 hours after not receiving Copy 3 of Manifest No. PAB0025282 (dated January 23, 1985) with the hand-written signature of the authorized representative of the TSD facility involved (Robert Ross & Sons, Inc. of Grafton, Ohio) within 35 days of the date the shipment was accepted by the initial transporter.
- 2) Greenville Steel Car Company's failure to notify the Department violates 25 Pa. Code Section 75.262(j) and also constitutes unlawful conduct pursuant to Section 610(9) of the Solid Waste Management Act, 35 P.S. Section 6018.610(9).
- 3) In settlement of all claims for monetary penalties assessable against Greenville Steel Car Company, pursuant to Section 605 of the Solid Waste Management Act for the violations described above, Greenville Steel Car Company agrees to pay two-hundred dollars (\$200). This figure is for settlement purposes only as set forth herein, and shall be due and payable upon execution of this Letter-Agreement. The payment shall be submitted to the Department together with the signed copies of this Letter-Agreement and shall

be in the form of a certified check or the like, made payable to "Commonwealth of Pennsylvania, Solid Waste Abatement Fund" and shall be forwarded to Russell L. Crawford, Regional Solid Waste Manager, Bureau of Solid Waste Management, 1012 Water Street, Meadville, Pennsylvania 16335.

- 4) In consideration for the above payment, the Department agrees not to initiate any action pursuant to Section 605 of the Solid Waste Management Act against Greenville Steel Car Company for the violations as described above; provided, however, that nothing in this Letter-Agreement shall be construed to relieve Greenville Steel Car Company from any liability for environmental damage which may have resulted from the activity described herein.

Sincerely,

Russell L. Crawford  
Regional Solid Waste Manager  
Bureau of Waste Management

RLC/GGM/mr

Enclosure

APPROVED AS TO FORM AND LEGALITY:

\_\_\_\_\_  
Patti J. Saunders                      Date  
Attorney for the Commonwealth

FOR THE DEPARTMENT OF ENVIRONMENTAL RESOURCES:

\_\_\_\_\_  
Russell L. Crawford                      Date  
Regional Solid Waste Manager  
Meadville Regional Office

\_\_\_\_\_  
Patti J. Saunders                      Date  
Attorney for the Commonwealth

FOR GREENVILLE STEEL CAR COMPANY:

The undersigned states, subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authority, that he is authorized to execute this Letter-Agreement on behalf of Greenville Steel Car Company.

\_\_\_\_\_  
Name                                      Date  
Title

\_\_\_\_\_  
Name                                      Date  
Title

bc: Mercer County File  
Meadville Regional Office  
Chron. Enforcement File  
Chron. File  
BWM-Central Office  
U.S. EPA

RECEIVED  
DIV. OF FACILITIES

## CERTIFIED NUMBER

2311459

GSA No. 12345 XX

Form Approved OMB No. 155-R00XX

Please print in ink with ELITE type (12 character dot matrix).

|  |  |  |
|--|--|--|
| <b>EPA</b><br>U.S. ENVIRONMENTAL PROTECTION AGENCY<br><b>HAZARDOUS WASTE REPORT</b><br><br>RCRA 101<br><br>1986<br>PLEASE PLACE LABEL IN THIS SPACE<br><br>U.S. DEPARTMENT OF COMMERCE III | <b>I. TYPE OF HAZARDOUS WASTE REPORT</b>                         |  |
|  | <b>PART A: GENERATOR ANNUAL REPORT</b>                           |  |
|  | THIS REPORT IS FOR THE YEAR ENDING DEC. 31: 1985                 |  |
|  | <b>PART B: FACILITY ANNUAL REPORT</b>                            |  |
|  | THIS REPORT FOR YEAR ENDING DEC. 31: 1985                        |  |
|  | <b>PART C: UNMANIFESTED WASTE REPORT</b>                         |  |
|  | THIS REPORT IS FOR A WASTE RECEIVED (day, mo., & yr.): - - - - - |  |

**INSTRUCTIONS:** You may have received a preprinted label attached to the front of this pamphlet; attach it in the designated space above-left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the form is complete and correct, leave Sections II, III, and IV below blank. If you did not receive a preprinted label, complete all sections. "Installation" means a single site where hazardous waste is generated, tested, stored, or disposed of. Please refer to the specific instructions for generators or facilities before completing this report. The information requested herein is required by law (Section 3002.5004 of the Resource Conservation and Recovery Act).

|   |  |
|---|--|
| <b>II. INSTALLATION'S EPA ID NUMBER</b> |  |
| F P A D 0 0 4 3 3 4 1 8 1               |  |
| <b>III. NAME OF INSTALLATION</b>        |  |
| GREENVILLE STEEL CAR COMPANY            |  |
| <b>IV. INSTALLATION MAILING ADDRESS</b> |  |
| STREET OR P.O. BOX                      |  |
| 3 P O BOX 751 UNION STREET              |  |
| CITY OR TOWN                            |  |
| GREENVILLE                              |  |
| ST. ZIP CODE                            |  |
| PA 16125                                |  |
| <b>V. LOCATION OF INSTALLATION</b>      |  |
| STREET OR ROUTE NUMBER                  |  |
| SAME AS ABOVE                           |  |
| CITY OR TOWN                            |  |
| SAME AS ABOVE                           |  |
| ST. ZIP CODE                            |  |
| SAME AS ABOVE                           |  |
| <b>VI. INSTALLATION CONTACT</b>         |  |
| NAME (last and first)                   |  |
| BUBECK WILLIAM                          |  |
| PHONE NO. (area code & no.)             |  |
| 412-588-7000                            |  |

**VII. TRANSPORTATION SERVICES USED (for Part A reports only)**

List the EPA identification numbers for those transporters whose services were used during the reporting year represented by this report.

EPA ID NUMBER: OHD077786309

EPA ID NUMBER: OHD980614374

|  |  |
|--|--|
| <b>VIII. COST ESTIMATES FOR FACILITIES (for Part B reports only)</b> |  |
| <b>A. COST ESTIMATE FOR FACILITY CLOSURE</b>                         | <b>B. COST ESTIMATE FOR POST CLOSURE MONITORING AND MAINTENANCE (optional facilities only)</b> |
| \$   | \$   |

**IX. CERTIFICATION**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

William C Bubeck

A. PRINT OR TYPE NAME

William C Bubeck

B. SIGNATURE

2-12-86

C. DATE SIGNED





COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

SOUTH PLANT  
Inspection Date 10-3-2000  
Time Start 10:00 AM  
Time Finish 12:00 PM

## HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR☐ S Q GENERATOR

Company name TRINITY INDUSTRIES I.D. Number PAD004342556  
Site Address 100 YORK ST GREENVILLE PA  
County MERCER Municipality GREENVILLE Zip 16125  
Name of Inspector JOE GALUS WITH BRIAN MUMMERT  
Name & Title of Responsible Official \_\_\_\_\_  
Person Interviewed LARRY GRAFF + JAMES M. FLUCK Telephone (724) 588-7000  
Mailing Address (if different from above) SAME AS ABOVE  
Amount of Hazardous Waste Generated per Month: 72200 Pounds \_\_\_\_\_ Kgs

## 1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other \_\_\_\_\_  
PBR: ☐ Neutralization/WWTP ☐ Reclaim Other \_\_\_\_\_  
GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity HandlerUniversal Waste Types NONE

## 3. Hazardous Waste Transporters:

Transporter Name TRI-STATE MOTORS License Number PA-AH 0346  
Transporter Name \_\_\_\_\_ License Number \_\_\_\_\_  
Transporter Name \_\_\_\_\_ License Number \_\_\_\_\_

## 4. Types of hazardous waste generated and destination facility (location &amp; type).

| Waste Code         | Waste Description           | Destination Facility  |
|--------------------|-----------------------------|-----------------------|
| <u>D001 - F005</u> | <u>PAINT-RELATED WASTES</u> | <u>RINECO</u>         |
|                    |                             | <u>1007 VULAN RD.</u> |
|                    |                             | <u>BENTON, ARK.</u>   |
|                    |                             | <u>72105</u>          |
|                    |                             |                       |
|                    |                             |                       |
|                    |                             |                       |
|                    |                             |                       |



## INSPECTION REPORT COMMENTS

Date of Inspection 10-3-2000 Identification Number PAD 004342 556

Company/Facility/Site Name TRINITY INDUSTRIES

The South Plant continues production at a low level while the North Plant is shut down. Trinity expects to finish the small order for a line of rail cars to be by the middle of October 2000. Nothing is definite after this except that the North Plant will not operate.

A half dozen drums of hazardous wastes were seen in the storage shed at the east end of the plant. The cracks along the edge of the floor have been sealed since the last inspection. All drums are marked and labeled correctly. Drums of paint related wastes are filled at the paint line at the west end of the plant then labeled and taken to the shed.

### Recent hazardous waste manifest prepared

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) \_\_\_\_\_

Date \_\_\_\_\_

Inspector (signature) Joseph A. Galus 10-4-2000

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

## INSPECTION REPORT COMMENTS

Date of Inspection 10-3-2000 Identification Number PAD004342556Company/Facility/Site Name TRINITY IND

by Renewal for Trinity did not have the hazardous waste transporter license number for Tri-State Motors. A number was entered in this block but was not the transporter license number (the number for Tri-State is PA-AH0346). Trinity should contact Renewal about this to have the correct number entered.

Inspection logs, employee training procedures and the PPC Plan appear to be in compliance. The PPC Plan was revised recently. A copy of the recently submitted Biennial Report is on file. Trinity will continue to operate as a large quantity generator. This could change in the future.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) \_\_\_\_\_

Date \_\_\_\_\_

Inspector (signature) \_\_\_\_\_

Joseph A. Gahan 10-4-2000

Page \_\_\_ of \_\_\_

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT  
GENERATORS - PART A

Date of Inspection 7-14-97 Time start 2:00 Time finish 3:00  
Name of Inspector JOE GALUS  
Company, installation name TRINITY INDUSTRIES INC (SOUTH PLANT)  
Location W. OF RT. 58 E. OF RT. 18 S. OF GREENVILLE  
County MERCER Municipality GREENVILLE  
Identification number PAD004342550  
Name of responsible official DONALD CRAINE  
Title GENERAL MANAGER  
Mailing Address 100 YORK ST. GREENVILLE, PA 16125  
Area code and telephone number 412/588-7000  
Name of person interviewed SON GEARHARDT  
Title SOUTH PLANT MANAGER  
Mailing address (if different from above) SAME AS ABOVE  
Area code and telephone number " " "

1. Current waste handling method:

- |   |                                     |                                   |  |                                  |
|---|-------------------------------------|-----------------------------------|--|----------------------------------|
| a. <input type="checkbox"/> On-site             | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal            | <input type="checkbox"/> PBR     |
| b. <input type="checkbox"/> On-site             | <input type="checkbox"/> use,       | <input type="checkbox"/> reuse,   | <input type="checkbox"/> recycle,            | <input type="checkbox"/> reclaim |
| c. <input checked="" type="checkbox"/> Off-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input checked="" type="checkbox"/> disposal |                                  |
| d. <input type="checkbox"/> Off-site            | <input type="checkbox"/> use,       | <input type="checkbox"/> reuse,   | <input type="checkbox"/> recycle,            | <input type="checkbox"/> reclaim |

2. Amount of hazardous waste produced:

- a. APPROX. 1500g/MO. kg./mo.  
b. \_\_\_\_\_ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

| Waste Number | Destination Facility  | Location and Type  |
|--------------|-----------------------|--------------------|
|              | RINECO 1007 VULCAN RD | BENTON, ARK. 72015 |
|              |                       |                    |
|              |                       |                    |
|              |                       |                    |
|              |                       |                    |
|              |                       |                    |
|              |                       |                    |

4. Source Reduction: ☐ accomplished, ☐ proposed, ☐ not proposed

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES  
BUREAU OF WASTE MANAGEMENT

## INSPECTION REPORT COMMENTS

Date of Inspection 7-14-97 Identification Number PAD 004342556Company/Facility/Site Name TRINITY INDUSTRIES (SOUTH PLANT)

A concrete berm has been constructed around the South Plant hazardous waste drum storage building. The berm is seen at the base of the building and surrounds it except for the doorway where a concrete ramp has been constructed so fork lifts can move drums in and out.

The floor is concrete and there were no noticeable cracks. It appears to be impervious, however there were areas where the berm and floor meet that should be sealed better. The roof of the metal building has been repaired to prevent rain-water run-on into the building.

The doorway is open at this time but doors will be put in that can be secured.

There were no drums of hazardous waste stored in the building at this time.

Trinity Industries can be considered to be in compliance with Subchapter 265.178 of the hazardous waste rules and regulations.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) \_\_\_\_\_ Date \_\_\_\_\_

Inspector (signature) Joseph J. Zukas Date 7-15-97

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT  
GENERATORS - PART A

Date of Inspection 4-28-97 Time start 1:00 Time finish 3:30  
Name of Inspector JOE GALUS WITH ED MORRISON-AQ  
Company, installation name TRINITY INDUSTRIES (SOUTH PLANT)  
Location W. OF RT. 58, E. OF RT. 18 S. OF GREENVILLE  
County MERCER Municipality HEMPFIELD TWP.  
Identification number PAD 004342556  
Name of responsible official SCOTT SCHELL - DON CRAINE  
Title SAFETY DIRECTOR - GENERAL MGR.  
Mailing Address 100 YORK ST. GREENVILLE, PA 16125  
Area code and telephone number 412/588-7000  
Name of person interviewed SCOTT SCHELL  
Title SAME AS ABOVE  
Mailing address (if different from above) " " "  
Area code and telephone number " " "

1. Current waste handling method:

- |   |                                     |                                   |  |                                  |
|---|-------------------------------------|-----------------------------------|--|----------------------------------|
| a. <input type="checkbox"/> On-site             | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal            | <input type="checkbox"/> PBR     |
| b. <input type="checkbox"/> On-site             | <input type="checkbox"/> use,       | <input type="checkbox"/> reuse,   | <input type="checkbox"/> recycle,            | <input type="checkbox"/> reclaim |
| c. <input checked="" type="checkbox"/> Off-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input checked="" type="checkbox"/> disposal |                                  |
| d. <input type="checkbox"/> Off-site            | <input type="checkbox"/> use,       | <input type="checkbox"/> reuse,   | <input type="checkbox"/> recycle,            | <input type="checkbox"/> reclaim |

2. Amount of hazardous waste produced:

- a. APPROX. 1500 g/month kg./mo.  
b. \_\_\_\_\_ kg./yr.

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MAY 15 1997

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

| Waste Number | Destination Facility   | Location and Type |
|--------------|------------------------|-------------------|
| D001- D035   | RINECO 1007 VULCAN RD. | BENTON AR 72015   |
| F001- F005   |                        |                   |
|              |                        |                   |
|              |                        |                   |
|              |                        |                   |
|              |                        |                   |
|              |                        |                   |

4. Source Reduction: ☐ accomplished, ☐ proposed, ☐ not proposed

**Hazardous Waste Inspection Report  
Generators - Part B**

1-No Violation Observed    2-Not-Applicable    3-Not-Determined    4-Non-Compliance

| STATUS |   |   |   | REQUIREMENT   | CHAPTER CITATION      | LINE ITEM |
|--------|---|---|---|---|-----------------------|-----------|
| 1      | 2 | 3 | 4 |   |                       |           |
| ✓      |   |   |   | Records retained at designated location for 20 years  | 262.40(a)             | H026      |
|        | ✓ |   |   | Quarterly reports submitted to the Department   | 262.41(a)             | H027      |
|        | ✓ |   |   | Exception reporting procedures followed   | 262.42                | H028      |
|        | ✓ |   |   | Hazardous waste disposal plan, if required  | 262.45                | H029      |
| ✓      |   |   |   | Spill reporting procedures followed   | 262.46(a)             | H030      |
| ✓      |   |   |   | Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265 | 262.46(e)             | H031      |
|        | ✓ |   |   | Special requirements followed for international shipments   | 262.50, .53, .55, .60 | H032      |
|        |   | ✓ |   | Source reduction strategy prepared and available  | 262.80                | H033      |



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

# HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

Site Name TRINITY INDUSTRIES ID Number PAD 004342556 Date 4-28-97

Hazardous Waste Inspection Report  
Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

| STATUS |   |   |   | REQUIREMENT   | CHAPTER CITATION | LINE ITEM |
|--------|---|---|---|---|------------------|-----------|
| 1      | 2 | 3 | 4 |   |                  |           |
| ✓      |   |   |   | Hazardous waste determination, performed on all waste streams   | 262.11           | H001      |
| ✓      |   |   |   | Identification number   | 262.12           | H002      |
| ✓      |   |   |   | Hazardous waste shipments offered only to licensed transporters   | 262.12(d)        | H003      |
| ✓      |   |   |   | Authorization received from TSD facility for wastes shipped off-site within PA  | 262.13           | H004      |
| ✓      |   |   |   | PA manifest used for intrastate shipments   | 262.20(b)        | H005      |
| ✓      |   |   |   | TSD state manifest or PA manifest used for out-of-state shipments   | 262.20(c)        | H006      |
| ✓      |   |   |   | Manifests filled out properly and completely  | 262.20(g)        | H007      |
| ✓      |   |   |   | Manifests routed properly and within time limits (7 days)   | 262.23(e)(f)     | H008      |
| ✓      |   |   |   | Proper U.S. DOT shipping containers or packages being used <i>SEE COMMENT #3</i>  | 262.30(1)        | H009      |
|        |   |   | X | Shipping containers marked and labeled according according to U.S. DOT  | 262.30(2)        | H010      |
|        |   |   | X | Containers of 110 gal. or less permanently marked with required hazardous waste label <i>SEE COMMENT #3</i>   | 262.30(3)        | H011      |
|        | ✓ |   |   | Placards offered to transporter   | 262.33           | H012      |
|        |   | ✓ |   | Waste in containers or tanks accumulated on-site for less than 90 days  | 262.34(a)(1)     | H013      |
|        |   |   | X | Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J <i>COMMENT #3</i>                                 | 262.34(a)(2)     | H014      |
|        |   |   | X | Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3)) <i>SEE COMMENT #2</i> | 262.34(a)(3)     | H015      |
| ✓      |   |   |   | a). All containers of haz. waste in good condition  | 265.171          | H016      |
| ✓      |   |   |   | b). Containers compatible with hazardous waste being stored within  | 265.172          | H017      |
| ✓      |   |   |   | c). Containers of hazardous waste kept closed   | 265.173(a)       | H018      |
| ✓      |   |   |   | d). Containers of hazardous waste are managed to prevent leaks <i>COMMENT #3</i>  | 265.173(b)       | H019      |
|        |   |   | X | e). Containers of hazardous waste labelled to accurately identify contents  | 265.173(c)       | H020      |
|        |   |   | X | f). Haz. waste accumulation areas inspected at least weekly <i>SEE COMMENT #4</i>   | 265.174          | H021      |
| ✓      |   |   |   | g). Special requirements for ignitable, reactive and incompatible waste being met   | 265.176 - .177   | H022      |
|        |   |   | X | h). Proper containment and collection system(s) <i>SEE COMMENT #2</i>   | 265.178          | H023      |
|        |   |   | X | Containers clearly marked with accumulation date and visible for inspection <i>SEE COMMENT #3</i>   | 262.34(a)(4)     | H024      |
| ✓      |   |   |   | On the job or classroom personnel training program as per 265.16  | 262.34(a)(5)     | H025      |

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES  
BUREAU OF WASTE MANAGEMENT

## INSPECTION REPORT COMMENTS

Date of Inspection 4-28-97 Identification Number PAD 004342556

Company/Facility/Site Name TRINITY INDUSTRIES - SOUTH PLANT

① Trinity assembles and paints railroad cars. The company at this time is building cars only at the South Plant where hazardous wastes are generated and transported off-site. There has been no waste generation at the North plant for the last few months.

② Waste paint related materials are generated by the South Plant paint line where it is collected in 55-gallon drums. These drums are transported when full to a metal containment building storage area for hazardous wastes located on the east side of the plant and south of the main office. The containment building needs to be updated according to Title 25 the Hazardous Waste rules and regulations as stated under Subchapter 262.34 (a)(1)(i). (Also refer to Subchapter 265.178)

③ At this time there were drums of hazardous waste stored in the building and 4 stored outside the building that had no labels or accumulation date. Also there were drums of a raw material that could no longer be used and were to be transported off site as hazardous waste. These drums did have an accumulation date but none had the proper hazardous waste labeling. Labels and accumulation dates should be applied to the drums of waste when wastes are first put into the drums or when determined to be hazardous wastes.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) \_\_\_\_\_ Date \_\_\_\_\_

Inspector (signature) Joseph A. Talm Date 4-29-97

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES  
BUREAU OF WASTE MANAGEMENT

## INSPECTION REPORT COMMENTS

Date of Inspection 4-28-97Identification Number PAD 004342556Company/Facility/Site Name TRINITY INDUSTRIES - SOUTH PLANT

④ Since the staff has been reduced over the last few months there has been no documented weekly inspections of the hazardous waste storage areas. These should be continued as soon as possible.

⑤ A still has been put into operation to skim the paint-related wastes which can be recycled. There has been no still bottom sludge wastes transported off site since this process began. There will be in the future.

⑥ RCRA hazardous waste training is given to all material handlers. It does appear that more training may be needed in when to apply hazardous labels and mark the accumulation dates.

⑦ The PPC Plan is on file but will need to be updated due to the recent layoffs of contact personnel.

⑧ Trinity should bring the storage area and the labeling of drums into compliance with the state regulations. Another inspection will be conducted within thirty (30) days of the first one.

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Person interviewed (signature) \_\_\_\_\_

Date \_\_\_\_\_

Inspector (signature) \_\_\_\_\_

Joseph A. Johns

Date

4-29-97

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107

**SUBJECT:** RCRA Inspection - *GREENVILLE STEEL CAR CO.*  
*PAD 00 433 4181*

**DATE:** *Nov. 25, 1985*

**FROM:** William L. Walsh, EPS  
Pennsylvania RCRA Enforcement Section (3HW11) *WLW*

**TO:** File

**THRU:** Dave Fege, Acting Chief *DF*  
Pennsylvania RCRA Enforcement Section (3HW11)

THE STATE IS TAKING ACTION TO RESOLVE THE VIOLATIONS IN THIS  
INSPECTION REPORT.

WE WILL MONITOR THE STATE ACTIVITY REGARDING RESOLUTION OF  
THESE VIOLATIONS.

BSWMEPA  
=

1012 Water Street  
Meadville, Pennsylvania 16335  
Telephone: A. C. 814/724-8526  
October 8, 1985

CERTIFIED MAIL #P 042 076 011

NOTICE OF VIOLATION

Subject: Hazardous Waste Generator Inspection  
Greenville Steel Car Co.  
City of Greenville, Mercer County  
I. D. #PAD004334181

Mr. William Bubeck, Director of Safety and Security  
Greenville Steel Car Co.  
Union Street  
Greenville, Pennsylvania 16125

Dear Mr. Bubeck:

A Hazardous Waste Generator Inspection was conducted on September 27, 1985 at your facility pursuant to the Pennsylvania Solid Waste Management Act, the Act of July 7, 1980, P.L. 380, No. 97, 35 P.S. 6108.101 et. seq., and the Department's Rules and Regulations promogated thereunder. The requirements of this Act are being enforced by the Pennsylvania Department of Envirionmental Resources, which has also received interim authorization from the US Environmental Protection Agency to conduct a hazardous waste management program which complies with federal standards on EPA's behalf within the Commonwealth of Pennsylvania.

During this inspection, it was revealed that your Company had never received copy 3 of manifest PAB0025282 (dated January 23, 1985) which documented a shipment of F001/F003 hazardous wastes to Robert Ross and Sons, Inc. of Grafton, Ohio. Also, your Company had never notified by telephone nor submitted an exception report regarding the non-accountability of this shipment. These situations violate Subsection 75.262(j) of the Department's Rules and Regulations, which states, in part:

"a Generator shall notify by telephone and submit an exception report to the Department, if he has not received a copy of the manifest with the handwritten signature of the owner, operator, or authorized representative of the designated hazardous waste management facility within 45 days of the date the waste was accepted by the initial transporter or within 14 days of the date the waste was expected to arrive at the hazardous waste facility, whichever is less..."

The Act provides for separate penalties for any violation of its section, any rule or regulations of the Department, any permit condition and violation on separate days. Civil penalties could be assessed under Section 605 of the Act, and Section 606 provides for criminal penalties.

Mr. Bubeck

-2-

October 8, 1985

In order to resolve the above-stated violation, your Company should submit an exception report regarding the subject shipment to this office by October 12, 1985. Also, your Company should take whatever measures necessary to hereafter ensure that manifesting is conducted as per Departmental Rules and Regulations.

This Notice does not waiver, either expressly or implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any or all violations of law arising prior to or after the issuance of this Notice or the conditions upon which this Notice is based.

This Notice shall not be construed so as to waiver or impair any rights or the Department of Environmental Resources, heretofor or hereafter existing.

This Notice shall not be construed as a final action of the Department of Environmental Resources.

If you have any questions concerning these matters, please feel free to contact me.

Sincerely,

Guy G. McUmbert  
Solid Waste Specialist  
Bureau of Waste Management

GM/pap

bc: Mercer County File  
Meadville Regional File  
Bureau of Solid Waste Management Central Office  
US EPA  
Chron. Enforcement File  
Chron.

MEADVILLE

HAZARDOUS WASTE INSPECTION REPORT  
Generators - Part A

Date of inspection May 8, 1981 Time start 10:00 Time finish \_\_\_\_\_  
Name of inspector James Rozakis  
Company, installation name Chicago Bridge and Iron Co  
Location 100 York St.  
County Mercer Municipality Greenville  
Identification number Pa 0004342556  
Name of responsible official Walter Scales  
Title Plant Engineer  
Mailing address PO Box 610 Greenville Pa 16125  
Area code and phone no. 412-588-5500  
Name of person interviewed Walter Scales  
Title Plant Engineer  
Mailing address (if different from above) \_\_\_\_\_  
Area code and phone no. \_\_\_\_\_

RECEIVED  
BUREAU OF SOIL WASTE  
MAY 11 1981  
MANAGEMENT

1. Current waste handling method:

- a. ☒ On-site ☐ treatment, ☒ storage, ☐ disposal
- b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
- c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
- d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. 30,000 <sup>gal</sup> <sub>kg./mo.</sub>
- b. \_\_\_\_\_ <sub>kg./yr.</sub>

3. Types of hazardous waste produced by Hazardous Waste Number:

D001 F002 F017 U019 U112 U161 U226  
D002 F003 K062 U031 U154 U210 U228  
F001 F005 U002 U043 U159 U220 U239

4. Are hazardous wastes transported off-site by the generator? ☐ Yes ☒ No

RECEIVED  
BUREAU OF SOIL WASTE  
MAY 12 1981  
WASTE MANAGEMENT  
MEADVILLE, PA.

Control Office

## HAZARDOUS WASTE INSPECTION REPORT

## Part C - Comments

Date of inspection 5/8/81 Identification number PA D00042556  
Company, Installation name Chicago Bridge and Iron Co.  
County Morris Municipality Greenville

1. Area around storage tanks and drums should be diked in accordance to the regulations.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) Walter G. Seater Date 5/8/81  
Inspector (signature) Jim Roz Date 5/8/81



HAZARDOUS WASTE INSPECTION REPORT  
Part C - Comments

Date of inspection 5/9/81 Identification number PA D004342556  
Company, Installation name Chicago Bridge and Iron Co.  
County Morrell Municipality Greenville

1. Drums should be dated when accumulation begins
2. PPC plan is required by 5/21/81

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) Walter R. Scales Date 5/8/81

Inspector (signature) Jim Royster Date 5/8/81

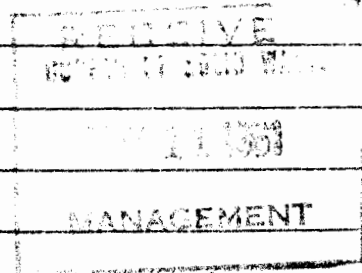
HAZARDOUS WASTE INSPECTION REPORT  
Generators - P B

1- NON-COMPLIANCE, 2- COMPLIANCE, 3- NOT APPLICABLE, 4- NOT DETERMINED

| COMPLIANCE STATUS |   |   |   | REQUIREMENT  | CHAPTER CITATION |
|-------------------|---|---|---|--|------------------|
| 1                 | 2 | 3 | 4 |  |                  |
|                   | ✓ |   |   | Identification number  | (c) (1)          |
|                   | ✓ |   |   | Hazardous waste shipments offered only to licensed transporters                | (c) (4)          |
|                   | ✓ |   |   | Authorization received from TSD facility for wastes shipped off-site           | (d)              |
|                   | ✓ |   |   | PA manifest used for intrastate shipments                                      | (e) (1)          |
|                   |   |   | ✓ | Disposer state manifest or EPA format manifest used for out-of-state shipments | (e) (1)          |
|                   | ✓ |   |   | Manifests filled out properly and completely                                   | (e) (1)          |
|                   | ✓ |   |   | Manifests routed properly and within time limits (24 hours)                    | (e) (2)          |
|                   | ✓ |   |   | Proper U.S. DOT shipping containers or packages                                | (f) (1)          |
|                   | ✓ |   |   | Shipping containers marked and labeled according to U.S. DOT                   | (f) (1)          |
|                   | ✓ |   |   | Containers of 100 gal. or less marked with required PA label                   | (f) (1)          |
|                   | ✓ |   |   | Placards offered to transporter  | (f) (2)          |
|                   | ✓ |   |   | Wastes accumulated on-site for less than 90 days                               | (g) (1)          |
| X                 |   |   |   | Wastes stored in proper containers and properly marked and labeled             | (g) (1)          |
|                   | ✓ |   |   | Containers managed in accordance with 75.265(g)                                | (g) (1)          |
| X                 |   |   |   | Containers clearly marked with accumulation date and visible for inspection    | (g) (1)          |
|                   | ✓ |   |   | Records retained at designated location for 20 years.                          | (h)              |
|                   | ✓ |   |   | Quarterly reports submitted to the Department                                  | (i)              |
|                   | ✓ |   |   | Exception reporting procedures followed  | (j)              |
|                   | ✓ |   |   | Hazardous waste disposal plan, if required                                     | (l)              |
|                   | ✓ |   |   | Spill reporting procedures followed  | (m) (2)          |
|                   |   |   | ✓ | Preparedness, Prevention and Contingency Plan approved and implemented         | (m) (5)          |
|                   |   | ✓ |   | Special requirements followed for international shipments                      | (o)              |
|                   |   |   |   |  |                  |
|                   |   |   |   |  |                  |
|                   |   |   |   |  |                  |
|                   |   |   |   |  |                  |
|                   |   |   |   |  |                  |

HAZARDOUS WASTE INSPECTION REPORT  
TSD Facilities - Part A

Date of inspection May 8 1981 Time start 10:00 Time finish \_\_\_\_\_  
Name of inspector James Rozek  
Company, installation name Chicago Bridge and Iron Co.  
Location 100 York St  
County Merzer Municipality Greenville  
Identification number PA0004342556  
Name of responsible official Walter Scales  
Title Plant Engineer  
Mailing address PO Box 610 Greenville Pa 16125  
Area code and phone no. 412-588-5500  
Name of person interviewed Walter Scales  
Title Plant Engineer  
Mailing address (if different from above) \_\_\_\_\_  
Area code and phone no. \_\_\_\_\_



1. Site characterization:

- a. ☐ Treatment - ☐ surface impoundments, ☐ chemical, ☐ physical, ☐ biological  
b. ☒ Storage - ☒ containers, ☒ tanks, ☐ surface impoundments, ☐ waste piles  
c. ☐ Disposal - ☐ land treatment, ☐ landfill, ☐ incineration, ☐ thermal treatment  
d. ☐ Use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Does the facility generate hazardous wastes? ☒ Yes ☐ No

3. Types of hazardous waste produced by Hazardous Waste Number:

0001 F002 F017 U019 U112 U161 U226  
0002 F003 K062 U031 U154 U210 U228  
F001 F005 U002 U043 U159 U220 U239

4. Are hazardous wastes transported off-site by the facility? ☒ Yes ☐ No

RECEIVED  
BUREAU OF SOLID

MAY 11 1981

WASTE MANAGEMENT  
MEADVILLE, PA.

HAZARDOUS WASTE INSPECTION REPORT  
TSD FACILITIES - PART B General p.1

1- NON-COMPLIANCE, 2- COMPLIANCE, 3- NOT APPLICABLE, 4- NOT DETERMINED

| COMPLIANCE STATUS |   |   |   | REQUIREMENT   | CHAPTER CITATION<br>75.265 |
|-------------------|---|---|---|---|----------------------------|
| 1                 | 2 | 3 | 4 |   |                            |
|                   | ✓ |   |   | Part A permit application submitted   | (a) (2), (2)               |
|                   | ✓ |   |   | Identification number   | (b)                        |
|                   |   | ✓ |   | Wastes accepted at facility transported by haulers licensed to transport hazardous waste by the Department  | (b) (1)                    |
|                   |   | ✓ |   | Waste streams not covered by permit approved by the Department before acceptance  | (c)                        |
| ✓                 |   |   |   | Chemical and physical analyses repeated as required   | (c) (1)                    |
|                   |   | ✓ |   | All waste shipments inspected and sampled   | (c) (2)                    |
|                   |   | ✓ |   | Waste analysis plan on-site   | (c) (3)                    |
| ✓                 |   |   |   | 24 hr. surveillance at active portion   | (d) (2) (                  |
| ✓                 |   |   |   | Artificial barrier at active portion  | (d) (2) (                  |
| ✓                 |   |   |   | Proper signs posted and legible at a distance of at least 25 ft.  | (d) (3)                    |
| ✓                 |   |   |   | Inspection schedule on-site   | (e) (2)                    |
| ✓                 |   |   |   | Maintenance schedule on-site for equipment or structures which reveal deterioration or malfunction  | (e) (4)                    |
| ✓                 |   |   |   | Immediate remedial action taken where a hazard is imminent or has already occurred  | (e) (4)                    |
| ✓                 |   |   |   | On the job or classroom personnel training program  | (f)                        |
| ✓                 |   |   |   | Records retained for each employee at facility of training, job title, and job description  | (f) (6),                   |
| ✓                 |   |   |   | Ignitable or reactive wastes separated from source of ignition or reaction  | (g) (1)                    |
| ✓                 |   |   |   | No smoking signs displayed where there are hazards from ignitable or reactive wastes  | (g) (1)                    |
| ✓                 |   |   |   | Treatment, storage, disposal of ignitable or reactive wastes or mixing of incompatible wastes or materials conducted according to requirements    | (g) (2)                    |
| ✓                 |   |   |   | Facility equipped with internal alarm system capable of providing immediate emergency instruction to personnel                                    | (h) (2) (                  |
| ✓                 |   |   |   | Facility equipped with a device for summoning outside emergency assistance  | (h) (2) (                  |
| ✓                 |   |   |   | Facility equipped with fire control, spill control, and decontamination equipment   | (h) (2) (                  |
| ✓                 |   |   |   | Facility equipped with water at adequate volume and pressure to supply fire control equipment   | (h) (2) (                  |
| ✓                 |   |   |   | Facility communications or alarm systems, fire control, spill control, and decontamination equipment tested and maintained.                       | (h) (3)                    |
| ✓                 |   |   |   | Adequate aisle space maintained to allow unobstructed movement of personnel and equipment during emergencies                                      | (h) (6)                    |
|                   |   | ✓ |   | Contingency plan on-site and implemented  | (i) (1)                    |
|                   |   | ✓ |   | Contingency plan describes action taken by personnel in the event of an emergency   | (i) (3)                    |
|                   |   | ✓ |   | Contingency plan describes arrangements agreed to for outside emergency services such as police and fire department, hospitals, contractors, etc. | (i) (5)                    |

1- NON-COMPLIANCE, 2- COMPLIANCE, 3- NOT APPLICABLE, 4- NOT DETERMINED

| COMPLIANCE STATUS |   |   |   | REQUIREMENT  | CIR<br>CITE |
|-------------------|---|---|---|--|-------------|
| 1                 | 2 | 3 | 4 |  |             |
|                   |   | ✓ |   | Contingency plan contains an up-to-date list of names, addresses and phone numbers of all persons qualified to act as emergency coordinator. | (i) (1)     |
|                   |   | ✓ |   | Contingency plan contains list of emergency equipment including location, physical description and capabilities of each item                 | (i) (1)     |
|                   |   | ✓ |   | Contingency plan contains an evacuation plan if there is a possibility that evacuation could be necessary                                    | (i) (1)     |
|                   |   | ✓ |   | One employee designated as the primary emergency coordinator either on the premises or on call.  | (i) (1)     |
|                   |   | ✓ |   | Facility accepting only PA manifests   | (j)         |
|                   |   | ✓ |   | Manifests properly completed and routed within time limits (24 hrs.)   | (j) (2)     |
|                   |   | ✓ |   | Manifest discrepancies resolved or reported within time limits   | (j) (4)     |
| ✓                 |   |   |   | Written operating record maintained on the premises  | (k)         |
| ✓                 |   |   |   | Written operating record contains description and quantity of wastes and method of treatment, storage or disposal                            | (k) (1)     |
| ✓                 |   |   |   | Written operating record contains location and quantity of each hazardous waste  | (k) (2)     |
|                   | ✓ |   |   | Written operating record contains results of waste analyses and treatability tests   | (k) (2)     |
| ✓                 |   |   |   | Written operating record contains reports and details of all incidents   | (k) (2)     |
| ✓                 |   |   |   | Written operating record contains records and results of all inspections   | (k) (2)     |
| ✓                 |   |   |   | Written operating record contains required monitoring, testing, and analytical data  | (k) (2)     |
| ✓                 |   |   |   | Written operating record contains closure and post-closure cost estimates  | (k) (2)     |
| ✓                 |   |   |   | All records retained on premises and available for inspection  | (l)         |
| ✓                 |   |   |   | Quarterly reports submitted to the Department  | (m)         |
| ✓                 |   |   |   | Emissions, discharges, fires, explosions, and groundwater contamination reported as required   | (m) (2)     |
|                   | ✓ |   |   | Groundwater monitoring wells located at approved sites   | (n) (2)     |
|                   | ✓ |   |   | Adequate protection of groundwater monitoring wells  | (n) (7)     |
|                   | ✓ |   |   | Groundwater sampling and analysis plan on the premises   | (n) (8)     |
|                   | ✓ |   |   | Groundwater quality assessment and abatement outline on the premises   | (n) (14)    |
| ✓                 |   |   |   | Closure plan on the premises and up-to-date  | (o) (2)     |
| ✓                 |   |   |   | Post-closure plan on the premises and up-to-date   | (o) (10)    |
| ✓                 |   |   |   | Annual closure cost estimate on the premises and up-to-date  | (p) (2)     |
| ✓                 |   |   |   | Annual post-closure cost estimate on the premises and up-to-date   | (p) (4)     |
|                   |   |   |   |  |             |

U.S. ENVIRONMENTAL PROTECTION AGENCY  
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

**INSTRUCTIONS:** If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

INSTALLATION'S EPA I.D. NO.

PAD004334181

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

GREENVILLE STEEL CAR COMPANY\*\*  
UNION ST  
GREENVILLE, PA 16125

III. LOCATION OF INSTALLATION

UNION ST  
GREENVILLE, PA 16125

## FOR OFFICIAL USE ONLY

## COMMENTS

| INSTALLATION'S EPA I.D. NUMBER |   |   |   |   |   |   |   |   |   | APPROVED |   | DATE RECEIVED (yr., mo., & day) |  |  |  |  |  |  |  |
|--------------------------------|---|---|---|---|---|---|---|---|---|----------|---|---------------------------------|--|--|--|--|--|--|--|
| F                              | P | A | D | 0 | 0 | 4 | 3 | 3 | 4 | 1        | 8 | 1                               |  |  |  |  |  |  |  |

## I. NAME OF INSTALLATION

GREENVILLE STEEL CAR COMPANY

## II. INSTALLATION MAILING ADDRESS

## STREET OR P.O. BOX

3 UNION STREET

## CITY OR TOWN

4 GREENVILLE

## ST.

## ZIP CODE

PA 16125

## III. LOCATION OF INSTALLATION

## STREET OR ROUTE NUMBER

5 UNION STREET

## CITY OR TOWN

6 GREENVILLE

## ST.

## ZIP CODE

PA 16125

## IV. INSTALLATION CONTACT

## NAME AND TITLE (last, first, &amp; job title)

## PHONE NO. (area code &amp; no.)

2 FISHER GEORGE PLANT MAINT. ENG 412 588 7000

## V. OWNERSHIP

## A. NAME OF INSTALLATION'S LEGAL OWNER

8 AMPCO PITTSBURGH CORPORATION

## B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

F = FEDERAL  
M = NON-FEDERAL

M

## VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☒

A. GENERATION

☒

B. TRANSPORTATION (complete item VII)

☐

C. TREAT/STORE/DISPOSE

☐

D. UNDERGROUND INJECTION

## VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐

A. AIR

☐

B. RAIL

☒

C. HIGHWAY

☐

D. WATER

☐

E. OTHER (specify):

## VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☐

A. FIRST NOTIFICATION

☒

B. SUBSEQUENT NOTIFICATION (complete item C)

## C. INSTALLATION'S EPA I.D. NO.

PAD004334181

## IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

| I.D. - FOR OFFICIAL USE ONLY |   |  |  |  |  |  |  |  |  |  |  |    |    |    |  |
|------------------------------|---|--|--|--|--|--|--|--|--|--|--|----|----|----|--|
| S                            |   |  |  |  |  |  |  |  |  |  |  |    |    |    |  |
| W                            |   |  |  |  |  |  |  |  |  |  |  |    |    |    |  |
| 1                            | 2 |  |  |  |  |  |  |  |  |  |  | 13 | 14 | 15 |  |

# IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

**A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES.** Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

|         |         |         |         |         |         |
|---------|---------|---------|---------|---------|---------|
| 1       | 2       | 3       | 4       | 5       | 6       |
| F 0 0 1 | F 0 0 3 | F 0 0 5 | F 0 1 7 |         |         |
| 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 |
| 7       | 8       | 9       | 10      | 11      | 12      |
| 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 |

**B. HAZARDOUS WASTES FROM SPECIFIC SOURCES.** Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

|         |         |         |         |         |         |
|---------|---------|---------|---------|---------|---------|
| 13      | 14      | 15      | 16      | 17      | 18      |
|         |         |         |         |         |         |
| 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 |
| 19      | 20      | 21      | 22      | 23      | 24      |
| 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 |
| 25      | 26      | 27      | 28      | 29      | 30      |
| 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 |

**C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES.** Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

|         |         |         |         |         |         |
|---------|---------|---------|---------|---------|---------|
| 31      | 32      | 33      | 34      | 35      | 36      |
|         |         |         |         |         |         |
| 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 |
| 37      | 38      | 39      | 40      | 41      | 42      |
| 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 |
| 43      | 44      | 45      | 46      | 47      | 48      |
| 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 |

**D. LISTED INFECTIOUS WASTES.** Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

|         |         |         |         |         |         |
|---------|---------|---------|---------|---------|---------|
| 49      | 50      | 51      | 52      | 53      | 54      |
|         |         |         |         |         |         |
| 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 |

**E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES.** Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE  
(D001)

☐ 2. CORROSIVE  
(D002)

☒ 3. REACTIVE  
(D003)

☒ 4. TOXIC  
(D000)

## X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

NAME & OFFICIAL TITLE (type or print)

DATE SIGNED

Albert A. Beers

Albert A. Beers  
Plant Engineer

11/18/80

# GREENVILLE STEEL CAR COMPANY

(SUBSIDIARY OF PITTSBURGH FORGINGS COMPANY)

AREA CODE 412 588-7000



**GREENVILLE, PA.**

16125

PLANTS OF  
PITTSBURGH FORGINGS COMPANY

CORAOPOLIS, PA.

JACKSON, MICHIGAN

PHILADELPHIA, PA.

GREENVILLE, PA.

November 18, 1980

EPA - Region III  
P. O. Box 1460  
Philadelphia, PA 19170

Dear Sir:

Please find enclosed a subsequent notification of hazardous waste activity form. Due to the recent additions of hazardous waste categories I wish to re-submit a revised form including those items which result from our operation. I have also deleted certain items because upon researching our operation and the regulations, I have determined that those items do not become waste from our facility in the manner listed.

Sincerely yours,

George F. Fisher  
Plant Maintenance Engineer  
Greenville Steel Car Co.

GFF/kmt

Enclosure

*changed 11/24/80*



U.S. ENVIRONMENTAL PROTECTION AGENCY  
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

**INSTRUCTIONS:** If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

INSTALLATION'S EPA I.D. NO.

PAD004334181

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

GREENVILLE STEEL CAR COMPANY\*\*  
UNION ST  
GREENVILLE, PA 16125

III. LOCATION OF INSTALLATION

UNION ST  
GREENVILLE, PA 16125

## FOR OFFICIAL USE ONLY

## COMMENTS

RURA SECTION  
EPA REGION III

AUG 18 00 0000 48

INSTALLATION'S EPA I.D. NUMBER  
F P A D 0 0 4 3 3 4 1 8 1  
APPROVED  
DATE RECEIVED (yr., mo., & day)  
8 0 0 8 1 8

## I. NAME OF INSTALLATION

GREENVILLE STEEL CAR COMPANY

## II. INSTALLATION MAILING ADDRESS

## STREET OR P.O. BOX

UNION STREET

## CITY OR TOWN

GREENVILLE

## ST.

## ZIP CODE

PA 16125

## III. LOCATION OF INSTALLATION

## STREET OR ROUTE NUMBER

UNION STREET

## CITY OR TOWN

GREENVILLE

## ST.

## ZIP CODE

PA 16125

## IV. INSTALLATION CONTACT

## NAME AND TITLE (last, first, &amp; job title)

FISHER GEORGE PLANT MAINTENANCE

## PHONE NO. (area code &amp; no.)

412-588-7000

## V. OWNERSHIP

## A. NAME OF INSTALLATION'S LEGAL OWNER

AMP CO- PITTSBURGH CORPORATION

## B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

F = FEDERAL  
M = NON-FEDERAL

M

## VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☒ A. GENERATION☒ B. TRANSPORTATION (complete item VII)☐ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

## VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☒ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

## VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION☐ B. SUBSEQUENT NOTIFICATION (complete item C)

## C. INSTALLATION'S EPA I.D. NO.

PAD004334181

## IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

|                              |   |   |   |   |   |   |   |   |    |    |    |
|------------------------------|---|---|---|---|---|---|---|---|----|----|----|
| I.D. - FOR OFFICIAL USE ONLY |   |   |   |   |   |   |   |   |    |    |    |
| W                            | P | A | D | D | 4 | 3 | 3 | 4 | 1  | 8  | 1  |
| 1                            | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 |

# IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

|                         |                         |                         |                         |               |               |
|-------------------------|-------------------------|-------------------------|-------------------------|---------------|---------------|
| 1<br>F 0 0 1<br>23 - 26 | 2<br>F 0 0 3<br>23 - 26 | 3<br>F 0 0 5<br>23 - 26 | 4<br>F 0 1 7<br>23 - 26 | 5<br>23 - 26  | 6<br>23 - 26  |
| 7<br>23 - 26            | 8<br>23 - 26            | 9<br>23 - 26            | 10<br>23 - 26           | 11<br>23 - 26 | 12<br>23 - 26 |

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

|               |               |               |               |               |               |
|---------------|---------------|---------------|---------------|---------------|---------------|
| 13<br>23 - 26 | 14<br>23 - 26 | 15<br>23 - 26 | 16<br>23 - 26 | 17<br>23 - 26 | 18<br>23 - 26 |
| 19<br>23 - 26 | 20<br>23 - 26 | 21<br>23 - 26 | 22<br>23 - 26 | 23<br>23 - 26 | 24<br>23 - 26 |
| 25<br>23 - 26 | 26<br>23 - 26 | 27<br>23 - 26 | 28<br>23 - 26 | 29<br>23 - 26 | 30<br>23 - 26 |

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

|                          |                          |                          |                          |                          |               |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|---------------|
| 31<br>U 1 1 2<br>23 - 26 | 32<br>U 1 5 4<br>23 - 26 | 33<br>U 1 6 2<br>23 - 26 | 34<br>U 2 2 6<br>23 - 26 | 35<br>U 2 3 9<br>23 - 26 | 36<br>23 - 26 |
| 37<br>23 - 26            | 38<br>23 - 26            | 39<br>23 - 26            | 40<br>23 - 26            | 41<br>23 - 26            | 42<br>23 - 26 |
| 43<br>23 - 26            | 44<br>23 - 26            | 45<br>23 - 26            | 46<br>23 - 26            | 47<br>23 - 26            | 48<br>23 - 26 |

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

|               |               |               |               |               |               |
|---------------|---------------|---------------|---------------|---------------|---------------|
| 49<br>23 - 26 | 50<br>23 - 26 | 51<br>23 - 26 | 52<br>23 - 26 | 53<br>23 - 26 | 54<br>23 - 26 |
|---------------|---------------|---------------|---------------|---------------|---------------|

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

|  |   |   |  |
|--|---|---|--|
| <input checked="" type="checkbox"/> 1. IGNITABLE<br>(D001) | <input type="checkbox"/> 2. CORROSIVE<br>(D002) | <input checked="" type="checkbox"/> 3. REACTIVE<br>(D003) | <input checked="" type="checkbox"/> 4. TOXIC<br>(D000) |
|--|---|---|--|

## X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

|                                     |  |                        |
|-------------------------------------|--|------------------------|
| SIGNATURE<br><i>Albert A. Beers</i> | NAME & OFFICIAL TITLE (type or print)<br>Albert A. Beers<br>Plant Engineer | DATE SIGNED<br>8/15/80 |
|-------------------------------------|--|------------------------|

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building  
Philadelphia, Pennsylvania 19107

DATE: FEB 7, 1986

TO: Inspection - GREENVILLE STEEL CAR CO.  
PAD 00 433 4181

FROM: William L. Walsh, EPS  
Pennsylvania RCRA Enforcement Section (3HW11) WLW

FOR: File

THRU: Harry S. McPhail, Chief  
Pennsylvania RCRA Enforcement Section (3HW11)

THE STATE IS TAKING ACTION TO RESOLVE THE VIOLATIONS IN THIS  
INSPECTION REPORT.

WE WILL MONITOR THE STATE ACTIVITY REGARDING RESOLUTION OF  
THESE VIOLATIONS.



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES

P. O. Box 2063  
Harrisburg, Pennsylvania 17120

TRANSMITTAL OF SETTLEMENT

TO: Bureau of Waste Management  
Division of Compliance & Monitoring  
Fulton Building  
P. O. Box 2063  
Harrisburg, Pennsylvania 17120

SUBJECT: Penalty for failure to follow proper exception reporting  
procedures.

FROM: Jim Rozakis  
Regional Operations Supervisor

PROSECUTOR: Guy G. McUmber, Solid Waste Specialist

DEFENDANT: Greenville Steel Car Company

ADDRESS: Union Street  
Greenville, Pennsylvania 16125

VIOLATION: Section(s) 610(9) of "The Pennsylvania Solid Waste Management Act" and 375.262(j) of Chapter 75.

LOCATION: Political Subdivision Greenville, Mercer County

FINE(S): \$200.00

IMPOSED: December 3, 1985

FUND: THE GENERAL FUND OF THE COMMONWEALTH

(Attach check payable to the "Commonwealth of Pennsylvania" noted that it is to be deposited in the Solid Waste Abatement Fund of the Commonwealth.)

(Submit original and two copies)

CERTIFIED NUMBER  
2311455

**greenville steel car**

60-343  
433

December 4, 1985

 An Ampco-Pittsburgh Company

No.046461

PAY

**PAID 1200 461**

\$200.00

TO THE  
ORDER  
OF

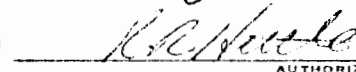
COMMONWEALTH OF PENNSYLVANIA  
SOLID WASTE ABATEMENT FUND

GREENVILLE STEEL CAR CO.

FIRST SENECA BANK  
OIL CITY, PENNSYLVANIA

  
AUTHORIZED SIGNATURE

⑈046461⑈ ⑆043303434⑆ 20⑈03168⑈

  
AUTHORIZED SIGNATURE

THE ATTACHED CHECK IS TENDERED IN  
FULL PAYMENT OF THIS ACCOUNT

GREENVILLE STEEL CAR COMPANY  
GREENVILLE, PA.

PLEASE DETACH BEFORE DEPOSITING

| INVOICE DATE   | INVOICE AMOUNT | INV. NUMBER  | DISCOUNT | NET AMOUNT |
|----------------|----------------|--|----------|------------|
| 1985<br>Dec. 4 | \$ 200.00      | Re: Department of Environmental Resources<br>letter dated December 3, 1985 |          | \$ 200.00  |

CERTIFIED NUMBER  
2311455

**DETACH**

DEPT OF ENVIRONMENTAL RESOURCES  
BUREAU OF SOLID WASTE MGMT.  
1012 WATER STREET  
MEADVILLE, PA. 16335  
DEC 5 1985

**RECEIVED**



MRC

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES

1012 Water Street  
Meadville, Pennsylvania 16335  
Telephone: A. C. 814/724-8526

December 3, 1985

CERTIFIED MAIL: P-042-056-813

Subject: Letter-Agreement  
Greenville Steel Car Company  
City of Greenville, Mercer County  
I.D. #PAD004334181

Mr. William Bubeck, Director of Safety & Security  
Greenville Steel Car Company  
Union Street  
Greenville, Pennsylvania 16125

Dear Mr. Bubeck:

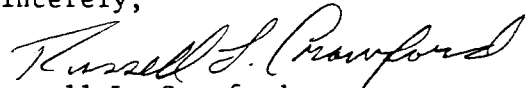
I am forwarding three (3) copies of a Letter-Agreement in settlement of violations of the Pennsylvania Solid Waste Management Act, the Act of July 7, 1980, P.L. 380, 35 P.S. Section 6018.101 et seq., which occurred at your company's Greenville facility. Please sign all copies and return them to this Office within ten (10) days of your receipt thereof. You will receive an executed copy for your records after the document is signed on behalf of the Department of Environmental Resources. The facts of the matter and the terms of this settlement are as follows:

- 1) Greenville Steel Car Company did not notify the Department by telephone within 24 hours after not receiving Copy 3 of Manifest No. PAB0025282 (dated January 23, 1985) with the hand-written signature of the authorized representative of the TSD facility involved (Robert Ross & Sons, Inc. of Grafton, Ohio) within 35 days of the date the shipment was accepted by the initial transporter.
- 2) Greenville Steel Car Company's failure to notify the Department violates 25 Pa. Code Section 75.262(j) and also constitutes unlawful conduct pursuant to Section 610(9) of the Solid Waste Management Act, 35 P.S. Section 6018.610(9).
- 3) In settlement of all claims for monetary penalties assessable against Greenville Steel Car Company, pursuant to Section 605 of the Solid Waste Management Act for the violations described above, Greenville Steel Car Company agrees to pay two-hundred dollars (\$200). This figure is for settlement purposes only as set forth herein, and shall be due and payable upon execution of this Letter-Agreement. The payment shall be submitted to the Department together with the signed copies of this Letter-Agreement and shall

be in the form of a certified check or the like, made payable to "Commonwealth of Pennsylvania, Solid Waste Abatement Fund" and shall be forwarded to Russell L. Crawford, Regional Solid Waste Manager, Bureau of Solid Waste Management, 1012 Water Street, Meadville, Pennsylvania 16335.

- 4) In consideration for the above payment, the Department agrees not to initiate any action pursuant to Section 605 of the Solid Waste Management Act against Greenville Steel Car Company for the violations as described above; provided, however, that nothing in this Letter-Agreement shall be construed to relieve Greenville Steel Car Company from any liability for environmental damage which may have resulted from the activity described herein.

Sincerely,



Russell L. Crawford  
Regional Solid Waste Manager  
Bureau of Waste Management

RLC/GGM/mr

Enclosure

APPROVED AS TO FORM AND LEGALITY:

Patti J. Saunders 12-2-85  
Patti J. Saunders Date  
Attorney for the Commonwealth

FOR THE DEPARTMENT OF ENVIRONMENTAL RESOURCES:

Russell L. Crawford 12/5/85  
Russell L. Crawford Date  
Regional Solid Waste Manager  
Meadville Regional Office

Patti J. Saunders 12/9/85  
Patti J. Saunders Date  
Attorney for the Commonwealth

\_\_\_\_\_  
Name Date  
Title

FOR GREENVILLE STEEL CAR COMPANY:

The undersigned states, subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authority, that he is authorized to execute this Letter-Agreement on behalf of Greenville Steel Car Company.

William C. Bubeck 12-4-85  
Name Date  
Title  
Director of Safety & Security.

CERTIFIED NUMBER  
2311455

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III - 6th & Walnut Sts.

Philadelphia, Pa. 19106

SUBJECT: RCRA Inspection *GREENVILLE STEEL CAR Co.*  
*PAO # 00 433 4181*

FROM: *[Signature]* Dana J. Barnett, Environmental Protection Specialist  
RCRA Enforcement Section (3HW11)

TO: File

Thru: *[Signature]* Peter W. Schaul, Chief  
RCRA Enforcement Section (3HW11)

DATE: 12/27/84

BASED UPON REVIEW OF THE RCRA INSPECTION REPORT FOR THE FACILITY  
REFERENCED ABOVE, I HAVE DETERMINED THAT NO FURTHER ACTION IS  
REQUIRED AT THIS TIME.



USEPA

3WMSO

1012 Water Street  
Headville, Pennsylvania 16335  
Telephone: A. C. 814/724-8526  
December 10, 1984

CERTIFIED MAIL #P 446 369 630

Subject: Hazardous Waste Generator Inspection  
Greenville Steel Car Company  
Borough of Greenville, Mercer County  
I.D. No. PAD0004334181

Mr. William Bubeck  
Director of Safety & Security  
Greenville Steel Car Company  
Union Street  
Greenville, Pennsylvania 16125

Dear Mr. Bubeck:

Enclosed is a copy of the report completed following the subject inspection conducted on November 30, 1984. As noted in the report, your company has properly corrected the violations noted during the Department's August 14, 1984 inspection. Also, the Department has received Greenville Steel Car's settlement related to the earlier inspection, and wishes to express its appreciation for your company's expedient response in that matter.

Finally, should you have any questions, please feel free to contact me.

Sincerely,

Guy C. McMurber  
Solid Waste Specialist  
Bureau of Solid Waste Management

GCM/cbm

Enclosure

cc: Mercer County File  
Headville Regional File  
BSWM - Central Office  
U.S. EPA  
Chron.

HAZARDOUS WASTE INSPECTION REPORT  
Generators - Part A

DEPT OF ENVIRONMENTAL RESOURCES  
BUREAU OF SOLID WASTE MGMT.  
1012 WATER STREET  
MEADVILLE, PA. 16335

Date of inspection 30 NOV 84 Time start 2:00 PM Time finish 2:45 PM

Name of inspector CWY G. MCUMBER

Company, installation name GREENVILLE STEEL CAR COMPANY

Location UNION ST.

County MERCER Municipality GREENVILLE

Identification number PA0004334181

Name of responsible official MR. ALBERT DEERY

Title PLANT ENGINEER

Mailing address UNION ST., GREENVILLE, PA 16125

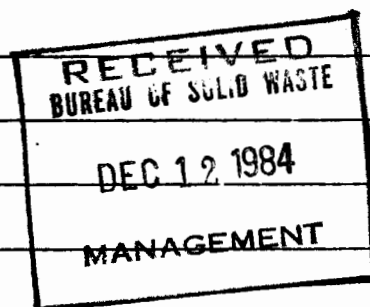
Area code and phone no. 412-586-7000

Name of person interviewed MR. WILLIAM BUBECK

Title DIRECTOR, SAFETY & SECURITY

Mailing address (if different from above) \_\_\_\_\_

Area code and phone no. \_\_\_\_\_



1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal
- b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
- c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
- d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. 25 55 GALLON DRUMS kg./mo. (WHEN ACTIVE)
- b. \_\_\_\_\_ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number:

0001, F001, F003

4. Are hazardous wastes transported off-site by the generator? ☐ Yes ☒ No

HAZARDOUS WASTE INSPECTION REPORT  
Generators - Part B

1- NON-COMPLIANCE, 2- COMPLIANCE, 3- NOT APPLICABLE, 4- NOT DETERMINED

| COMPLIANCE STATUS |   |   |   | REQUIREMENT  | CHAPTER CITATION |
|-------------------|---|---|---|--|------------------|
| 1                 | 2 | 3 | 4 |  |                  |
|                   |   |   |   |  | 75.262           |
|                   | ✓ |   |   | Identification number  | (c) (1)          |
|                   |   | ✓ |   | Hazardous waste shipments offered only to licensed transporters                | (c) (4)          |
|                   |   | ✓ |   | Authorization received from TSD facility for wastes shipped off-site           | (d)              |
|                   |   | ✓ |   | PA manifest used for intrastate shipments                                      | (e) (1) (i)      |
|                   |   | ✓ |   | Disposer state manifest or EPA format manifest used for out-of-state shipments | (e) (1) (iii)    |
|                   |   | ✓ |   | Manifests filled out properly and completely                                   | (e) (1)          |
|                   |   | ✓ |   | Manifests routed properly and within time limits (24 hours)                    | (e) (2)          |
| ✓                 |   |   |   | Proper U.S. DOT shipping containers or packages                                | (f) (1) (i)      |
| ✓                 |   |   |   | Shipping containers marked and labeled according to U.S. DOT                   | (f) (1) (ii)     |
| ✓                 |   |   |   | Containers of 110 gal. or less marked with required PA label                   | (f) (1) (iii)    |
| ✓                 |   |   |   | Placards offered to transporter  | (f) (2)          |
| ✓                 |   |   |   | Wastes accumulated on-site for less than 90 days                               | (g) (1)          |
| ✓                 |   |   |   | Wastes stored in proper containers and properly marked and labeled             | (g) (1) (i)      |
| ✓                 |   |   |   | Containers managed in accordance with 75.265(g)                                | (g) (1) (ii)     |
| ✓                 |   |   |   | Containers clearly marked with accumulation date and visible for inspection    | (g) (1) (iv)     |
|                   |   | ✓ |   | Records retained at designated location for 20 years                           | (h)              |
|                   |   | ✓ |   | Quarterly reports submitted to the Department                                  | (i)              |
|                   |   | ✓ |   | Exception reporting procedures followed  | (j)              |
|                   |   | ✓ |   | Hazardous waste disposal plan, if required                                     | (l)              |
|                   |   | ✓ |   | Spill reporting procedures followed  | (m) (1)          |
| ✓                 |   |   |   | Preparedness, Prevention and Contingency Plan approved and implemented         | (m) (5)          |
|                   |   | ✓ |   | Special requirements followed for international shipments                      | (o)              |
|                   |   |   |   |  |                  |
|                   |   |   |   |  |                  |
|                   |   |   |   |  |                  |
|                   |   |   |   |  |                  |
|                   |   |   |   |  |                  |

## HAZARDOUS WASTE INSPECTION REPORT

## Part C - Comments

Date of inspection 30 NOV 84 Identification number PA0004334181  
Company, Installation name GREENVILLE STEEL CAR COMPANY  
County MERCER Municipality GREENVILLE

THE PURPOSE OF THIS INSPECTION WAS TO FOLLOWUP ON THE 14 AUGUST 84  
INSPECTION AND ENSURE THAT THE VIOLATIONS NOTED DURING THAT INSPECTION  
HAVE BEEN CORRECTED. FROM THIS INSPECTION, IT APPEARED THAT ALL  
LABELLING REQUIREMENTS ARE NOW BEING COMPLIED WITH.

This inspection report is official notification that a representative of the Department of  
Environmental Resources, Bureau of Solid Waste Management, inspected the above installation.  
The findings of this inspection are shown in this report. Any violations which were uncovered  
during the inspection are indicated. Violations may also be discovered upon examination of the  
results of laboratory analyses and review of Department records. Notification will be forth-  
coming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) MARCEA CERRECEDA Date #P446369630

Inspector (signature) [Signature] Date 7 DEC 84

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III - Elm & Walnut Sts

Philadelphia Pa 19106

SUBJECT: RCRA Inspection: *GREENVILLE STEEL CAR CO.*  
*PAD 00433 4181*

DATE: *11/5/84*

FROM: *[Signature]* James Webb, Environmental Engineer  
RCRA Enforcement Section (3HW11)

TO: File

Thru: *[Signature]* Peter W. Schaul, Chief  
RCRA Enforcement Section (3HW11)

BASED UPON REVIEW OF THE RCRA INSPECTION REPORT FOR THE FACILITY

REFERENCED ABOVE, I HAVE DETERMINED THAT NO FURTHER ACTION IS

REQUIRED AT THIS TIME. *VIOLATIONS HAVE BEEN CORRECTED AS PER*  
*ATTACHED TELECON.*

| RECORD OF COMMUNICATION   |                  | <input checked="" type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE<br><input type="checkbox"/> OTHER (SPECIFY) |                        |
|---|------------------|--|------------------------|
|   |                  | (Record of item checked above)   |                        |
| <b>TO:</b><br>GUY M LUMBER - DER (Med)<br>SOLID WASTE SPECIALIST  | <b>FROM:</b><br> | <b>DATE</b><br>11/5/84   | <b>TIME</b><br>9:35 AM |
| <b>SUBJECT</b><br>INSPECTIONS / NOV'S   |                  |  |                        |
| <b>SUMMARY OF COMMUNICATION</b>   |                  |  |                        |
| <p>① Greenville Steel Can Co. - PAD 00 433 4181: Drums are now being correctly labelled &amp; marked w/accumulation dates. All waste present at time of inspection has been shipped off-site. A settlement letter w/a penalty of \$500 is being prepared.</p> <p>② Talon, Inc. PAD 04 529 7066: unauthorized treatment in drums has been stopped (neutralization); Drums now labelled &amp; marked correctly.</p> <p>③ Abex Corp. - PAD 00 431 8416: All waste removed/cleaned up and containers are now properly marked. A settlement letter w/penalty is being prepared.</p> <p>④ Rusco, Industries. PAD 09 8082 8917: Haz. waste determination completed - waste stripper soap will be handled as haz. waste. 40 of 500 drums moved off-site to reclaimer. Material must be separated into light &amp; heavy fractions for reclamation to continue (heavy fraction to be incinerated). Expect additional 160 drums to be removed this week. If not, Rusco will be ordered to send all waste to incinerator.</p> <p>⑤ Sharon Steel - Damascus Tube PAD 06 561 8530 - drums now labelled correctly. Other waste non-hazardous.</p> <p>⑥ General Electric (Grove City) PAD 00 592 9090 - drums are now labelled/marked correctly w/accumulation dates. Steel shot &amp; glass bead waste streams determined non-hazardous.</p> <p>⑦ Trans Penn Was Corp. PAD 00 433 2573: Now storing &lt;90 days. Drums labelled/marked correctly; Dump considered non-hazardous (municipal/residual waste on base of old refinery waste). Municipal/residual waste to be removed to approved landfill. DER to request subsurface investigation.</p> |                  |  |                        |

BSWM / CENTRAL OFFICE

1012 Water Street  
Greenville, PA 16335  
Telephone: 814/724-8520  
September 5, 1984

CERTIFIED MAIL #P 334 302 305

NOTICE OF VIOLATION

Subject: Hazardous Waste Generator Inspection  
Greenville Steel Car Company  
borough of Greenville, Mercer County  
I. O. #7A0004334151

Mr. Albert Baer,  
Plant Engineer  
Greenville Steel Car Company  
Union Street  
Greenville, PA 16335

Dear Mr. Baer:

A Hazardous Waste Generator Inspection was conducted at your facility on August 14, 1984, pursuant to the Solid Waste Management Act of July 7, 1980, P.L. 960, No. 87, 35 P.S. 6013.101 et seq.; and the Chapter 75 Rules and Regulations of the Pennsylvania Department of Environmental Resources. During this inspection, the following violations were revealed:

1. Twenty-four F001 and F003 hazardous waste containers were observed as being not marked with required Pennsylvania labels. This situation violates subsection 75.262(f)(iii) of the Department's Rules and Regulations which states, in part:

"Before transporting or offering a shipment of hazardous waste for transportation off site, a generator shall perform the following:

Permanently mark each container of 110 gallons or less according to U.S. Department of Transportation requirements under 49 CFR, section 172.501..."

2. The aforementioned containers were also found as not being in accordance with U.S. Department of Transportation marking requirements and not indicated with accumulation information. These situations violate subsection 75.262(g)(1)(ii) and (iv), which state, respectively, (the former in part):



"A generator may accumulate hazardous waste on-site without a permit for ninety (90) days or less, provided that:

(ii) The waste is placed in containers which meet all U.S. Department of Transportation packaging, marking, and labeling requirements...

(iv) On each container, each date on which any hazardous waste was placed in that container shall be clearly marked and visible for inspection."

It should be noted that U.S. Department of Transportation regulations require that all hazardous waste containers be marked with the appropriate U.S. Department of Transportation shipping name. No such information was indicated on the aforementioned containers.

3. Also, one of the aforementioned containers was found as being open during storage. This situation violates Subsection 75.262(g)(iii) of the Department's Rules and Regulations, which states:

"A generator may accumulate hazardous waste on-site without a permit for ninety (90) days or less, provided that:

All containers are managed in accordance with Subsection 75.265(q) (relating to use and management of containers)."

Relatedly, Subsection 75.265(q)(3) of the Department's Rules and Regulations states that... "Any container holding hazardous waste shall be kept closed during storage, except when it is necessary to add or remove waste."

The Act provides for separate penalties for any violation of its sections, any rule or regulation of the Department, or any permit condition. Up to \$25,000 per violation in civil penalties could be assessed under Section 605 of the Act, and Section 606 also provides for criminal penalties.

In order to resolve the above stated violations, your company should:

1. Immediately mark and label all containers as per Subsection 75.262(f) and (g) of the Department's Rules and Regulations and assure that these requirements are followed in the future.
2. Immediately close the aforementioned open container and thereafter manage all containers as per subsection 75.262(g)(iii) of the Department's Rules and Regulations.

This notice does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of its laws arising prior to or after the issuance of this Notice or the conditions upon which the notice is based.

1984  
DIV. OF HAZARDOUS WASTE



This notice shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing.

This notice shall also not be construed as a final action of the Department of Environmental Resources.

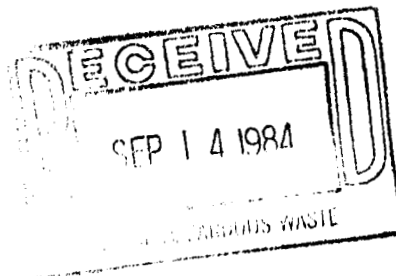
If you have any questions concerning this matter, please feel free to contact me.

Sincerely,

Guy G. Mcumber  
Solid Waste Specialist  
Bureau of Solid Waste Management

GGM/jmh

cc: Crawford County File  
Meadville Regional File  
Chron. File  
Chron. Enforcement File  
U. S. EPA  
Central office



9/14/84

HAZARDOUS WASTE INSPECTION REPORT  
Generators - Part A

DEPT OF ENVIRONMENTAL RESOURCES  
BUREAU OF SOLID WASTE MGMT.  
1012 WATER STREET  
MEADVILLE, PA. 16335

Date of inspection 14 AUG 84 Time start 2:30 AM Time finish 4:00 PM

Name of inspector GUY G. MCUMBER

Company, installation name GREENVILLE STEEL CAR COMPANY

Location GREENVILLE - UNION ST.

County MERCER Municipality GREENVILLE

Identification number PA0004334181

Name of responsible official MR. AL BEERS

Title PLANT ENGINEER

Mailing address UNION ST., GREENVILLE, PA 16125

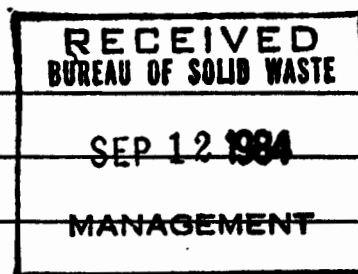
Area code and phone no. 412-588-7000

Name of person interviewed MR. AL BEERS

Title \_\_\_\_\_

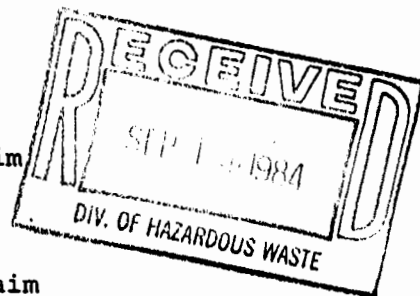
Mailing address (if different from above) \_\_\_\_\_

Area code and phone no. \_\_\_\_\_



1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal
- b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
- c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
- d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim



2. Amount of hazardous waste produced:

- a. 25 55 GALLON DRUMS <sup>kg.</sup>/mo. (WHEN ACTIVE)
- b. \_\_\_\_\_ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number:

0001, F001, F003

4. Are hazardous wastes transported off-site by the generator? ☐ Yes ☒ No

HAZARDOUS WASTE INSPECTION REPORT  
Generators - Part B

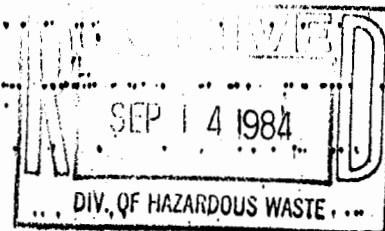
1- NON-COMPLIANCE, 2- COMPLIANCE, 3- NOT APPLICABLE, 4- NOT DETERMINED

| COMPLIANCE STATUS |   |   |   | REQUIREMENT   | CHAPTER CITATION |
|-------------------|---|---|---|---|------------------|
| 1                 | 2 | 3 | 4 |   | 75.262           |
|                   | ✓ |   |   | Identification number   | (c) (1)          |
|                   | ✓ |   |   | Hazardous waste shipments offered only to licensed transporters                         | (c) (4)          |
|                   |   | ✓ |   | Authorization received from TSD facility for wastes shipped off-site                    | (d)              |
|                   |   | ✓ |   | PA manifest used for intrastate shipments   | (e) (1) (i)      |
|                   | ✓ |   |   | Disposer state manifest or EPA format manifest used for out-of-state shipments          | (e) (1) (ii)     |
|                   | ✓ |   |   | Manifests filled out properly and completely  | (e) (1)          |
|                   | ✓ |   |   | Manifests routed properly and within time limits (24 hours)                             | (e) (2)          |
|                   | ✓ |   |   | Proper U.S. DOT shipping containers or packages   | (f) (1) (i)      |
| X                 |   |   |   | Shipping containers marked and labeled according to U.S. DOT SEE NOTE #1                | (f) (1) (ii)     |
| X                 |   |   |   | Containers of 110 gal. or less marked with required PA label SEE NOTE #1                | (f) (1) (iii)    |
|                   | ✓ |   |   | Placards offered to transporter   | (f) (2)          |
|                   | ✓ |   |   | Wastes accumulated on-site for less than 90 days  | (g) (1)          |
| X                 |   |   |   | Wastes stored in proper containers and properly marked and labeled SEE NOTE #1          | (g) (1) (i)      |
| X                 |   |   |   | Containers managed in accordance with 75.265(g) SEE NOTE #2                             | (g) (1) (ii)     |
| X                 |   |   |   | Containers clearly marked with accumulation date and visible for inspection SEE NOTE #1 | (g) (1) (iv)     |
|                   | ✓ |   |   | Records retained at designated location for 20 years                                    | (h)              |
|                   | ✓ |   |   | Quarterly reports submitted to the Department   | (i)              |
|                   | ✓ |   |   | Exception reporting procedures followed   | (j)              |
|                   | ✓ |   |   | Hazardous waste disposal plan, if required  | (l)              |
|                   | ✓ |   |   | Spill reporting procedures followed   | (m) (1)          |
|                   | ✓ |   |   | Preparedness, Prevention and Contingency Plan approved and implemented                  | (m) (5)          |
|                   | ✓ |   |   | Special requirements followed for international shipments                               | (o)              |
|                   |   |   |   |   |                  |
|                   |   |   |   |   |                  |
|                   |   |   |   |   |                  |
|                   |   |   |   |   |                  |
|                   |   |   |   |   |                  |

Date of inspection 14 AUG 84 Identification number PAD004334181  
Company, Installation name GREENVILLE STEEL CAR COMPANY  
County MERCER Municipality GREENVILLE

- ① TWENTY FOUR DRUMS OF F001 AND F003 WASTES WERE FOUND AS BEING TOTALLY UNMARKED; I.E. NO ACCUMULATION DATES, PA LABELS OR HAZARDOUS WASTE INFORMATION. THE NECESSARY LABELS AND INFORMATION SHOULD BE PUT ON THE CONTAINERS IMMEDIATELY.
- ② ONE HAZARDOUS WASTE CONTAINER WAS OBSERVED AS BEING OPEN DURING STORAGE. THIS CONTAINER SHOULD BE CLOSED IMMEDIATELY.

THE OPERATOR STATED THAT THESE VIOLATIONS WOULD BE CORRECTED AS SOON AS POSSIBLE.



This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) MAILED CERTIFIED # P534352 Date 365  
Inspector (signature) [Signature] Date